



# Offshore Oil & Gas Drilling/ Development and Production from 8 wells in Western Offshore Block MB/OSDF/B80/2016 of Heera Panna Basin in Arabian Sea

M/s Hindustan Oil Exploration Company Ltd.  
(HOEC)

Risk Assessment & Disaster Management Plan

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DRAFT REPORT

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## 1. ADDITIONAL STUDIES

### 1.1 Risk Assessment

This section on Quantitative Risk Assessment (QRA) aims to provide a systematic analysis of the major risks that may arise from drilling of 6 development wells drilling and evacuating the oil and gas through existing subsea pipeline of ONGC in the offshore Block B-80 of Heera-Panna-Bassein. The QRA process outlines rational evaluations of the identified risks based on their significance and provides the outline for appropriate preventive and risk mitigation measures. Results of the QRA provides valuable inputs into the overall project planning and the decision making process for effectively addressing the identified risks. This will ensure that the project risks stay below As Low As Reasonably Practicable (ALARP) levels at all times during project implementation. In addition, the QRA will also help in assessing risks arising from potential emergency situations like a blow out and develop a structured Emergency Response Plan (ERP) to restrict damage to personnel, infrastructure and the environment.

The risk study for the onshore drilling and testing activities has considered all aspects of operation of the drilling rig and other associated activities during the development phase. Loss of well control / blow-out and process/pipeline leaks constitute the major potential hazards that may be associated with the proposed onshore development and production of oil and natural gas at the identified well locations within the B-80 Block.

The following section describes objectives, methodology of the risk assessment study and then presents the assessment for each of the potential risk separately. This includes identification of major hazards, hazard screening and ranking, frequency and consequence analysis for major hazards. The hazards have subsequently been quantitatively evaluated through a criteria based risk evaluation matrix. Risk mitigation measures to reduce significant risks to acceptable levels have also been recommended as a part of the risk assessment study.

### 1.2 Objectives of the QRA Study

The overall objective of this QRA with respect to the proposed project involves identification and evaluation of major risks, prioritizing risks identified based on their hazard consequences and formulating suitable risk reduction/mitigation measures in line with the ALARP principle. Hence in order to ensure effective management of any emergency situations (with potential individual and societal risks) that may arise during the development drilling activities, following specific objectives need to be achieved.

- Identify potential risk scenarios that may arise out of proposed development well drilling, operation of oil and gas pipelines and associated equipment's, mud chemicals storage and handling etc.
- Analyse the possible likelihood and frequency of such risk scenarios by reviewing historical accident related data for onshore oil and gas industries.
- Predict the consequences of such potential risk scenarios and if consequences are high, establish the same by through application of quantitative simulations.
- Recommend feasible preventive and risk mitigation measures as well as provide inputs for drawing up of Emergency Management Plan (EMP) for the Project.

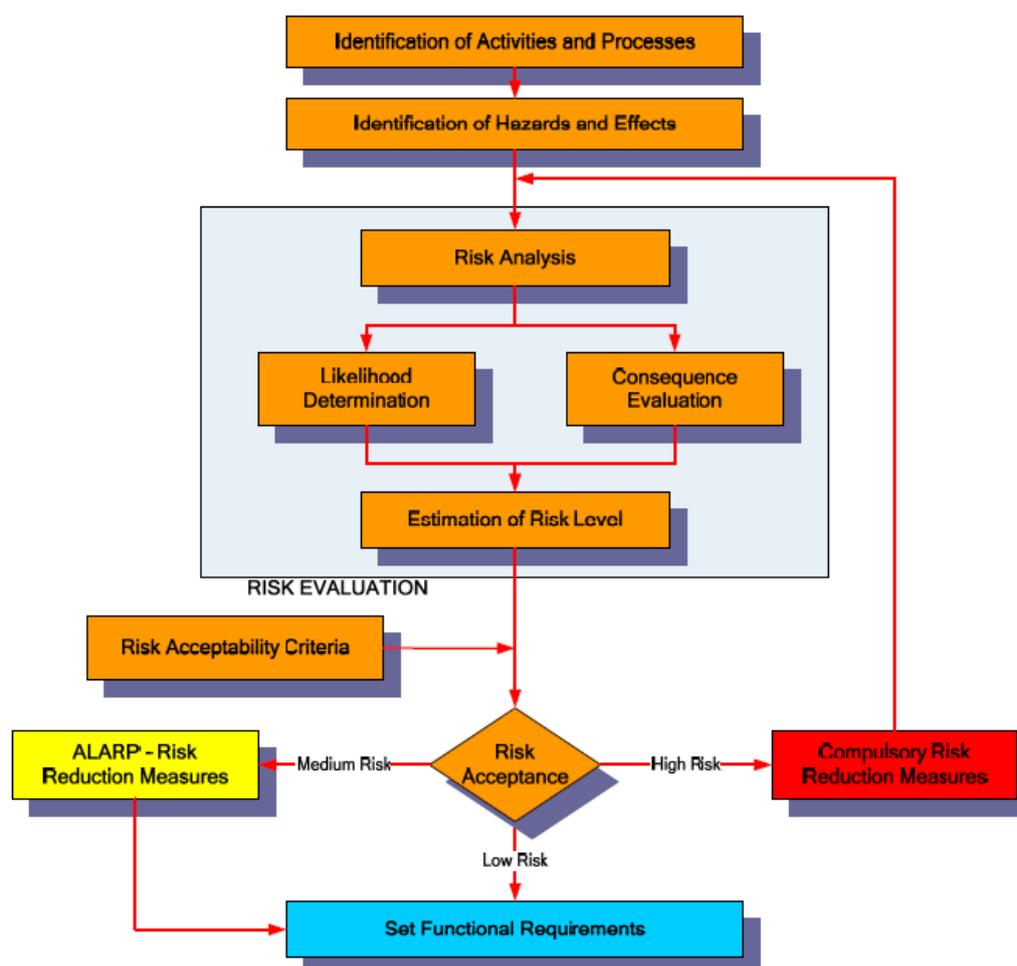
### 1.3 Risk Assessment Methodology

The risk assessment process is primarily based on likelihood of occurrence of the risks identified and their possible hazard consequences particularly being evaluated through hypothetical accident scenarios. With respect to the proposed Project, major risks viz. blow outs, pipeline and process leaks, non-process fires etc. have been assessed and evaluated through a risk matrix generated to

combine the risk severity and likelihood factor. Risk associated with the well exploration and development activities have been determined semi-quantitatively as the product of likelihood/probability and severity/consequence by using order of magnitude data (risk ranking = severity/consequence factor X likelihood/probability factor). Significance of such project related risks was then established through their classification as high, medium, low, very low depending upon risk ranking.

The risk matrix is a widely accepted as standardized method of quantitative risk assessment and is preferred over purely quantitative methods, given that its inherent limitations to define a risk event is certain. Application of this tool has resulted in the prioritization of the potential risks events for the drilling activity thus providing the basis for drawing up risk mitigation measures and leading to formulation of plans for risk and emergency management. The overall approach is summarized in the Error! Reference source not found..

**Figure 1.1 Risk Assessment Methodology**



### 1.3.1 Hazard Identification

Hazard identification for the purposes of this QRA comprised of a review of the Project and associated activity related information provided by HOEC. In addition, guidance provided by knowledge platforms/portals of the upstream oil & gas industry including OGP, ITOF, EGIG and DNV, Norwegian Petroleum Directorate etc. are used to identify potential hazards that can arise out of proposed Project activities. Taking into account the applicability of different risk aspects in context of the development drilling operations to be undertaken in the identified well locations, there are three

major categories of hazards that can be associated with proposed Project which has been dealt with in detail. This includes:

- Blowouts leading to uncontrolled well flow, jet fires, pool fires;
- Non-process fires / explosions, the release of a dangerous substance or any other event resulting from a work activity which could result in death or serious injury to people within the site;
- Leaks from sub-sea pipeline network leading to jet fire or pool fire; and
- Any event which may result in major damage to the structure of the MOPU.

Well control incident covers a range of events which have the potential of leading to blow-outs but are generally controlled by necessary technological interventions. Hence, such incidents are considered of minor consequences and as a result not well documented. Other possible hazard scenarios like mud chemical spills, falls, etc. has also not been considered for detailed assessment as preliminary evaluation has indicated that the overall risk that may arise out of them would be low. In addition, it is understood that, causative factors and mitigation measures for such events can be adequately taken care of through exiting safety management procedures and practices of HOEC.

It must also be noted here that many hazards identified are sometimes interrelated with one hazard often having the ability to trigger off another hazard through a domino effect. For example, a large oil spill in most instances is caused by another hazardous incident like a blowout or process leak. This aspect has been considered while drawing up hazard mitigation measures and such linkages (between hazards) has also been given due importance for managing hazards and associated risks in a composite manner through HOEC's Health, Safety & Environmental Management System (HSEMS) and through the Emergency Management Plan, if a contingency situation so arises.

### 1.3.2 Frequency Analysis

Frequency analysis involves estimating the likelihood of each of the failure cases identified during the hazard identification stage. The analysis of frequencies of occurrences for the key hazards that has been listed out is important to assess the likelihood of such hazards to actually unfold during the lifecycle of the project. The frequency analysis approach for the proposed Project is based primarily on historical accident frequency data, event tree analysis and judgmental evaluation. Major oil and gas industry information sources viz. statistical data, historical records and global industry experience were considered during the frequency analysis of the major identified risks<sup>1</sup>.

For QRA for the proposed Project, various accident statistics and published oil industry databases have been consulted for arriving at probable frequencies of identified hazards. However, taking into account the absence of representative historical data/statistics with respect to onshore operations<sup>2</sup>, relevant offshore accident databases have been considered in the frequency analysis of identified hazards. The same has been recommended in the "*Risk Assessment Data Directory*" published by the International Association of Oil & Gas Producers (OGP). Key databases/reports referred as part of the QRA study includes *Worldwide Offshore Accident Databank (WOAD)*, *Outer Continental Shelf (OCS) Reports*, *Norwegian Petroleum Directorate Directives*, *Offshore Reliability Data (OREDA) Handbook*, *HSE Offshore Incident Database*, *SINTEF Offshore Blowout Database* etc.

<sup>1</sup>It is to be noted that the frequency of occurrences are usually obtained by a combination of component probabilities derived on basis of reliability data and /or statistical analysis of historical data.

<sup>2</sup>Although Alberta Energy & Utilities Board (EUB) maintains a database for onshore incidents for the period 1975-1990 the same has not been considered in the context of the present study as the Alberta wells are believed to be sour with precaution being taken accordingly to minimize the likelihood of release

Based on the range of probabilities arrived at for different potential hazards that may be encountered during the proposed well development activities, following criteria for likelihood rankings have been drawn up as presented in the **Table 1. 1**.

**Table 1. 1 Frequency Categories and Criteria**

Likelihood Ranking	Criteria Ranking (cases/year)	Frequency Class
5	>1.0	Frequent
4	>10 <sup>-1</sup> to <1.0	Probable
3	>10 <sup>-3</sup> to <10 <sup>-1</sup>	Occasional/Rare
2	>10 <sup>-5</sup> to <10 <sup>-3</sup>	Not Likely
1	>10 <sup>-6</sup> to <10 <sup>-5</sup>	Improbable

### 1.3.3 Consequence Analysis

In parallel to frequency analysis, hazard prediction / consequence analysis exercise assesses resulting effects in instances when accidents occur and their likely impact on project personnel, infrastructure and environment. In relation to the proposed Project, estimation of consequences for each possible event has been based either on accident experience, consequence modelling or professional judgment, as appropriate.

Given the high risk perception associated with blow outs in context of offshore drilling operation, a detailed analysis of consequences has been undertaken for blow outs taking into account physical factors and technological interventions. Consequences of such accidental events on the physical, biological and socio-economic environment have been studied to evaluate the potential of the identified risks/hazards. In all, the consequence analysis takes into account the following aspects:

- Nature of impact on environment and community;
- Occupational health and safety;
- Asset and property damage;
- Corporate image
- Timeline for restoration of environmental and property damage
- Restoration cost for environmental and property damage

The following criterion for consequence rankings (**Table 1. 2**) is drawn up in context of the possible consequences of risk events that may occur during proposed well development activities:

**Table 1.2 Severity Categories and Criteria**

<i>Consequence</i>	<i>Ranking</i>	<i>Criteria Definition</i>
Catastrophic	5	<ul style="list-style-type: none"> <li>■ Multiple fatalities/Permanent total disability to more than 50 persons</li> <li>■ Severe violations of national limits for environmental emission</li> <li>■ More than 5 years for natural recovery</li> <li>■ Net negative financial impact of &gt;10 crores</li> <li>■ Long term impact on ecologically sensitive areas</li> <li>■ International media coverage</li> <li>■ National stakeholder concern and media coverage</li> </ul>
Major	4	<ul style="list-style-type: none"> <li>■ Single fatality/permanent total disability to one or more persons</li> <li>■ Major violations of national limits for environmental emissions</li> <li>■ 2-5 years for natural recovery</li> <li>■ Net negative financial impact of 5 -10 crores</li> <li>■ Significant impact on endangered and threatened floral and faunal species</li> <li>■ Loss of corporate image and reputation</li> </ul>
Moderate	3	<ul style="list-style-type: none"> <li>■ Short term hospitalization &amp; rehabilitation leading to recovery</li> <li>■ Short term violations of national limits for environmental emissions</li> <li>■ 1-2 years for natural recovery</li> <li>■ Net negative financial impact of 1-5 crores</li> <li>■ Short term impact on protected natural habitats</li> <li>■ State wide media coverage</li> </ul>
Minor	2	<ul style="list-style-type: none"> <li>■ Medical treatment injuries</li> <li>■ 1 year for natural recovery</li> <li>■ Net negative financial impact of 0.5 - 1 crore</li> <li>■ Temporary environmental impacts which can be mitigated</li> <li>■ Local stakeholder concern and public attention</li> </ul>
Insignificant	1	<ul style="list-style-type: none"> <li>■ First Aid treatment with no Lost Time Incidents (LTIs)</li> <li>■ Natural recovery &lt; 1year</li> <li>■ Net negative financial impact of &lt;0.5 crores.</li> <li>■ No significant impact on environmental components</li> <li>■ No media coverage</li> </ul>

### 1.3.4 Risk Evaluation

Based on ranking of likelihood and frequencies, each identified hazard has been evaluated based on the likelihood of occurrence and the magnitude of consequences. Significance of risks is expressed as the product of likelihood and consequence of the risk event, expressed as follows:

$$\text{Significance} = \text{Likelihood} \times \text{Consequence}$$

The

Table 1. 3 below illustrates all possible product results for five likelihood and consequence categories while the **Table 1. 4** assigns risk significance criteria in four regions that identify the limit of risk acceptability. Depending on the position of intersection of a column with a row in the risk matrix, hazard prone activities have been classified as low, medium and high thereby qualifying a set of risk reduction / mitigation strategies.

**Table 1.3 Risk Matrix**

	Likelihood →						
			Frequent	Probable	Remote	Not Likely	Improbable
			5	4	3	2	1
Consequence ↑	Catastrophic	5	25	20	15	10	5
	Major	4	20	16	12	8	4
	Moderate	3	15	12	9	6	3
	Minor	2	10	8	6	4	2
	Insignificant	1	5	4	3	2	1

**Table 1.4 Risk Criteria and Action Requirements**

Risk Significance	Criteria Definition & Action Requirements
High (16 - 25)	“Risk requires attention” – Project HSE Management need to ensure that necessary mitigation are adopted to ensure that possible risk remains within acceptable limits
Medium (10 – 15)	“Risk is tolerable” – Project HSE Management needs to adopt necessary measures to prevent any change/modification of existing risk controls and ensure implementation of all practicable controls.
Low (5 – 9)	“Risk is acceptable” – Project related risks are managed by well-established controls and routine processes/procedures. Implementation of additional controls can be considered.
Very Low (1 – 4)	“Risk is acceptable” – All risks are managed by well-established controls and routine processes/procedures. Additional risk controls need not to be considered

## 1.4 Risk Assessment of Identified Project Hazards

As already discussed in the previous section, three major categories risk have identified in relation to proposed development drilling activities. A comprehensive risk assessment study has been undertaken to assess and evaluate significance of identified risks in terms of severity of consequences and likelihood of occurrence. Risk assessment study details have been summarized in the subsequent sections below:

### 1.4.1 Blow Outs/Loss of Well Control

Blow out is an uncontrolled release of well fluid (primarily hydrocarbons viz. oil and/or gas and may also include drilling mud, completion fluid, water etc.) from an exploratory or development well. Blow outs are the result of failure to control a kick and regain pressure control and are typically caused by

equipment failure or human error. The possible blow out cause events occurring in isolation or in combination have been listed below:

- Formation fluid entry into well bore;
- Loss of containment due to malfunction (viz. wire lining);
- Well head damage (e.g. by fires, storms, dropped object etc.); and
- Rig forced off station (e.g. by anchor failure) damaging Blow Out Preventer (BOP) or wellhead.

The most common cause of blow out can be associated with the sudden/unexpected entry/release of formation fluid into well bore that may arise as a result of the following events as discussed in the **Box 7.1** below:

## **Box 7.1 Primary Causes of Blow Outs**

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### **Shallow gas**

In shallow formations there may be pockets of shallow gas. In these instances there is often insufficient mud density in the well and no BOP is in place. If the hole strikes shallow gas the gas may be released on the drilling rig very rapidly. Typical geological features which suggest the presence of shallow gas can then be detected. Historically, striking of shallow gas has been one of the most frequent causes of blowouts in drilling.

### **Swabbing**

As the drill pipe is pulled upwards during trips out of the hole or upward movement of the drill string, the pressure in the hole beneath the drill bit is reduced, creating a suction effect. Sufficient drilling mud must be pumped down-hole to compensate for this effect or well fluids may enter the bore. Swabbing is also a frequent cause of drilling blowouts.

### **High formation pressure**

Drilling into an unexpected zone of high pressure may allow formation fluids to enter the well before mud weight can be increased to prevent it.

### **Insufficient mud weight**

The primary method of well control is the use of drilling mud; in correct operation, the hydrostatic pressure exerted by the mud prevents well fluids from entering the well bore. A high mud weight provides safety against well fluids in-flows. However, a high mud weight reduces drilling speed, therefore, mud weight is calculated to establish weight most suitable to safely control anticipated formation pressures and allows optimum rates of penetration. If the required mud weight is incorrectly calculated then well fluid may be able to enter the bore.

### **Lost Circulation**

Drilling mud circulation can be lost if mud enters a permeable formation instead of returning to the rig. This reduces the hydrostatic pressures exerted by the mud throughout the well bore, and may allow well fluids from another formation to enter the bore.

### **Gas cut mud**

Drilling fluids are denser than well fluids; this density is required to provide the hydrostatic pressure which prevents well fluids from entering the bore. If well fluids mix with the mud then its density will be reduced. As mud is circulated back to surface, hydrostatic pressure exerted by the mud column is reduced. Once gas reaches surface it is released into the atmosphere.

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*Source: A Guide to Quantitative Risk Assessment for Offshore Installations; John Spouge – DNV Technical Publication 99/100a*

For better understanding, causes of blow outs have been systematically defined in terms of loss of pressure control (failure of primary barrier), uncontrolled flow of fluid or failure of secondary barrier (BOP). The blow out incidents resulting from primary and secondary failures for proposed operations as obtained through comprehensive root cause analysis of the Gulf Coast (Texas, OCS and US Gulf of Mexico) Blow Outs<sup>3</sup> during 1960-1996 have been presented in the **Table 1.5** below.

**Table 1.5 Blow Out Cause Distribution for Failures - Drilling Operations**

Sl. No.	Causal Factors	Blow Out Incidents (Nos.)
<b>A.</b>	<b>Primary Barrier</b>	
1	Swabbing	77
2	Drilling Break	52
3	Formation breakdown	38
4	Trapped/expanding gas	09
5	Gas cut mud	26
6	Low mud weight	17
7	Wellhead failure	05
8	Cement setting	05
<b>B.</b>	<b>Secondary Barrier</b>	
1	Failure to close BOP	07
2	Failure of BOP after closure	13
3	BOP not in place	10
4	Fracture at casing shoe	03
5	Failure to stab string valve	09
6	Casing leakage	06

Thus, underlying blowout causes as discussed in the above table can be primarily attributed to swabbing as the primary barrier failure which is indicative of insufficient attention given to trip margin and controlling pipe movement speed. Also, it is evident from the above table that lack of proper maintenance, operational failures and absence of BOPs as secondary barrier contributed to majority of blowout incidents (approx. 30 nos.) is recorded.

#### 1.4.1.1 Blowout Frequency Analysis

Blow out frequency estimates is obtained from a combination of incident experience and associated exposure in a given area over a given period. For the purpose of calculation of blow out frequency analysis in context of the present study involving developmental drilling, blow out frequencies per well drilled have been considered.

The blowout frequencies presented in this report are extracted from the latest revision of the Scandpower<sup>4</sup> report and are presented in

<sup>3</sup> "Trends extracted from 1200 Gulf Coast blowouts during 1960-1996" – Pal Skalle and A.L Podio

<sup>4</sup> "Blowout and Well Release Frequencies" - Based on SINTEF Offshore Blowout Database 2010, Report, Scandpower Risk Management. Report no. 19.101.001-3009/2011/R3, 05.04.2011.

**Table 1. 6** below. The blowout probability is determined from blowouts in the North Sea. (I.e. British, Dutch and Norwegian sectors) given comparable data for onshore operations are not readily available.

**Table 1. 6 Blow Out Frequencies Recommended per Drilled Well**

<i>Drilling Operation</i>	<i>Well Category</i>	<i>Frequency, gas well</i>	<i>Frequency, oil well</i>
Exploration	Normal	1.12E-04	1.23E-04
Wild Cat	Normal	9.70E-05	1.17E-04
Appraisal	Normal	1.07E-04	1.30E-04
Development	Normal	2.16E-05	2.62E-05

Based on the aforesaid frequency and information provided by HOEC the blow out frequency for the proposed project has been computed as follows:

No of wells to be drilled per year = 2 (A)

Blow out frequency for development drilling (oil) =  $2.62 \times 10^{-5}$  per well drilled (B)

Blow out frequency for development drilling (gas) =  $2.16 \times 10^{-5}$  per well drilled (C)

Frequency of blow out occurrence for development (oil) =  $(A \times B) = 2 \times 2.62 \times 10^{-5}$   
 $= 5.24 \times 10^{-5}$  per well drilled

Frequency of blow out occurrence for development (gas) =  $(A \times C) = 2 \times 2.16 \times 10^{-5}$   
 $= 4.32 \times 10^{-5}$  per well drilled

Thus, the blow out frequency for the proposed project for development oil and gas wells have been identified to be as “**Not Likely**”

#### *1.4.1.2 Blowout Ignition Probability*

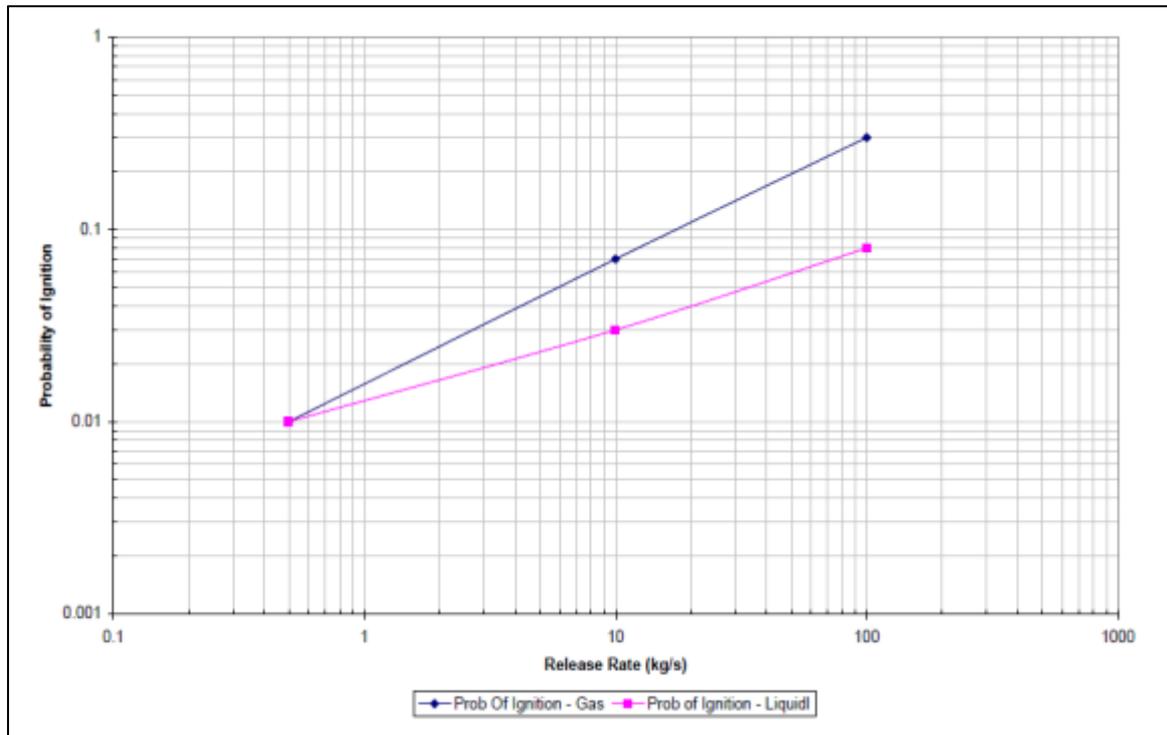
Review of SINTEF database indicates that a rounded ignition probability of 0.3 has been widely used for the purpose of quantitative risk analysis arising from blow outs. As per this database generally ignition occurred within first 5 minutes in approximately 40% of the blowouts leading to either pool and/or jet fire. Blow out leading to flammable gas release has a greater probability of ignition compared to liquid releases<sup>5</sup> (**Figure 1.2** Ignition Probability Vs Release Rate

<sup>5</sup>Fire and Explosion – Fire Risk Analysis by Daejun Change, Division of Ocean System and Engineering

Figure 1.2).

**Figure 1.2 Ignition Probability Vs Release Rate**

**Figure 1.2 Ignition Probability Vs Release Rate**



An alternative to the blowout ignition probabilities given by the UKOOA look-up correlations can be obtained from Scandpowers's interpretation of the blowout data provided by SINTEF 2. The most significant category is that for deep blowouts which indicates an early ignition probability of 0.09. For the purpose of the QRA study this can be taken as occurring immediately on release and calculation provided below:

No of wells to be drilled per year = 2 (A)

Blow out frequency for development drilling (oil) =  $2.62 \times 10^{-5}$  per well drilled (B)

Blow out frequency for development drilling (gas) =  $2.16 \times 10^{-5}$  per well drilled (C)

Blow out ignition probability = 0.09 (D)

Probability of Blow out ignition for development (oil) =  $(A \times B \times D) = 2 \times 2.62 \times 10^{-5} \times 0.09$   
 $= 0.47 \times 10^{-5} = \sim 0.00047\%$

Probability of Blow out ignition for development (gas) =  $(A \times C \times D) = 2 \times 2.16 \times 10^{-5} \times 0.09$   
 $= 0.38 \times 10^{-5} = \sim 0.00038\%$

Hence based on the aforesaid calculation the probability of ignition of blow out releases of hydrocarbons for the proposed development project for both oil and gas is found to range within  $\sim 0.00038\%$  and  $0.00047\%$  and therefore can be considered to be as negligible.

### 1.4.1.3 Blowout Consequence Analysis

Blow out from a hydrocarbon development wells may lead to the following possible risk consequences:

- Jet fires resulting from ignited gas blow outs; and
- Oil slicks resulting from un-ignited oil pools.

#### Pool fire

A pool fire is a turbulent diffusion fire burning above a pool of vaporizing hydrocarbon fuel where the fuel vapor has negligible initial momentum. The probability of occurrence of pool fires for oil and gas exploration is high due to continuous handling of heavy hydrocarbons. The evaporation of hydrocarbons from a pool forms a cloud of vapor above the pool surface which, on ignition, leads to generation of pool fire.

For the purpose of consequence modeling for pool fires resulting from blow outs, following hypothetical scenarios in terms of hydrocarbon (particularly crude oil) release rates (**Table 7.7**) have been considered based on DNV Technica’s FLARE program.

**Table 1.7 Pool Fire Modelling Scenario**

Scenario	Release Rate (kg/s)	Release Type
Scenario - I	1	Small
Scenario - II	10	Medium
Scenario – III (Worst Case)	50	Large

The release rates as specified for the aforesaid scenarios have been utilized in the computing the pool fire diameter utilizing the following equation and input parameters:

$$D = \sqrt{4Q / \pi b}$$

Where D = pool diameter (m)

Q = release rate (kg/s)

b = burning rate (kg/m<sup>2</sup>s)

The mass burning rate for crude oil has been considered to be 0.05 kg/m<sup>2</sup>s

Based on above equation, the pool fire diameter and the steady study burning areas computed for various release types have been presented in the **Table 7.8** below.

**Table 1.8 Pool Fire Diameter & Steady State Burning Scenario**

Scenario	Release Rate (kg/s)	Release Type	Pool fire diameter (m)	Steady State Burning Area (m <sup>2</sup> )
Scenario - I	1	Small	5.05	6.37
Scenario - II	10	Medium	15.96	63.69
Scenario - III	50	Large	35.69	318.47

The impact zone for long duration fires is conveniently described by thermal radiation contours and its effects on the people who are exposed to such radiation levels for one minute (60sec). The thermal radiation threshold values (measured in kilowatts per square meter) defined for crude oil pool fire consequence modeling is provided in **Table 7.9** below:

**Table 1.9 Thermal Radiation Intensity Threshold Values Impact Criterion**

<i>Threshold Radiation Intensity</i>	<i>Threat Zone</i>	<i>Impact Criterion</i>
<b>5.0 kW/m<sup>2</sup></b>	<b>Green</b>	<ul style="list-style-type: none"> <li>■ Escape actions within one minute.</li> <li>■ Cause second degree burns within 60 sec.</li> </ul>
<b>12.5 kW/m<sup>2</sup></b>	<b>Blue</b>	<ul style="list-style-type: none"> <li>■ Escape actions lasting for few seconds.</li> <li>■ Cause second degree burns within 40 sec.</li> </ul>
<b>37.5 kW/m<sup>2</sup></b>	<b>Red</b>	<ul style="list-style-type: none"> <li>■ Results in immediate fatality.</li> <li>■ Pain threshold is instantaneous leading to second degree burns within 8 sec.</li> </ul>

For estimating the distance to a pool fire heat radiation level that could cause second degree burns and fatality for a maximum exposure of 60 sec the following EPA equation and input parameters are utilized.

$$X = H_c \sqrt{\frac{0.0001 A}{5000 \Pi (H_v + C_p (T_B - T_A))}}$$

Where:

- X = distance to the heat radiation level (m)
- HC = heat of combustion of the flammable liquid (joules/kg)
- HV = heat of vaporization of the flammable liquid (joules/kg)
- A = pool area (m<sup>2</sup>)
- CP = liquid heat capacity (joules/kg-°K)
- TB = boiling temperature of the liquid (°K)
- TA = ambient temperature (°K)

For crude oil **HC = 42600000 joules/kg; HV = 957144 joules/kg; CP = 1892 joules/kg-°K; TB = 633 °K** and **TA = 300 °K**. The following input parameter along with pool area (m<sup>2</sup>) computed for blow out risk scenarios provided the distance to the threshold heat radiation levels for the threat zones and have been presented in **Table 7.10** below

**Table 1.10 Distance to Thermal Radiation Threshold Levels**

<i>Release Type</i>	<i>Pool fire diameter (m)</i>	<i>Pool fire area (m<sup>2</sup>)</i>	<i>Distance to 5.0 kW/m<sup>2</sup> (m)</i>	<i>Distance to 12.5 kW/m<sup>2</sup> (m)</i>	<i>Distance to 37.5 kW/m<sup>2</sup> (m)</i>
Small	5.05	6.37	6.81	4.31	2.49
Medium	15.96	63.69	21.54	13.62	7.86
Large	35.69	318.47	48.16	30.46	17.59

The worst hazard for release and ignition of crude oil at a rate of **50kg/s** for a thermal radiation intensity of **37.5 kW/m<sup>2</sup>** is likely to be experienced to a maximum distance of **17.59m** from the source with potential lethal effects experienced within 8 sec.

*Risk Ranking – Blowout Pool Fire (Worst Case Scenario)*

<b>Likelihood ranking</b>	<b>3</b>	<b>Consequence ranking</b>	<b>4</b>
<b>Risk Ranking &amp; Significance = 12 i.e. “Medium” i.e. Risk is Tolerable and can be managed through adoption of necessary controls.</b>			

## Ignition of Flammable Gas Release leading to Jet Fire

Jet fires are burning jet of gas or sprays of atomized liquids resulting from gas and condensate release from high pressure equipment and blow outs. Jet fires may also result in the release of high pressure liquid containing dissolved gas due to gas flashing off and turning the liquid into a spray of small droplets. In context of the present study, formation of jet fires can be attributed by the high pressure release and ignition of natural gas if encountered during exploration of block hydrocarbon reserves.

Natural gas as recovered from underground deposits primarily contains methane (CH<sub>4</sub>) as a flammable component, but it also contains heavier gaseous hydrocarbons such as ethane (C<sub>2</sub>H<sub>6</sub>), propane (C<sub>3</sub>H<sub>8</sub>) and butane (C<sub>4</sub>H<sub>10</sub>). Other gases such as CO<sub>2</sub>, nitrogen and hydrogen sulfide (H<sub>2</sub>S) are also often present. Methane is typically 90 percent, ethane 5-15 percent, propane and butane, up to 5 percent. Thus, considering higher percentage of methane in natural gas, the thermo-chemical properties of the same has been utilized in the jet fire blow out consequence modelling. The following risk scenarios (**Table 1.11**) have been considered for nature gas release consequence modelling:

**Table 1.11 Natural Gas Release Modelling Scenario**

Scenario	Release Rate (kg/s)	Release Type
Scenario - I	1	Small
Scenario - II	5	Medium
Scenario – III (Worst Case)	10	Large

The modelling of nature gas releases has been carried out using ALOHA. A Flammable Level of Concern approach has been utilized for assessing safety risk associated with the release of flammable gases (here methane) from well blow outs. In ALOHA, a flammable Level of Concern (LOC) is a threshold concentration of fuel in the air above which a flammability hazard may exist. While modelling the release of a flammable gas that may catch fire—but which is not currently burning—ALOHA can predict the flammable area of the vapour cloud so that flammability hazard can be established.

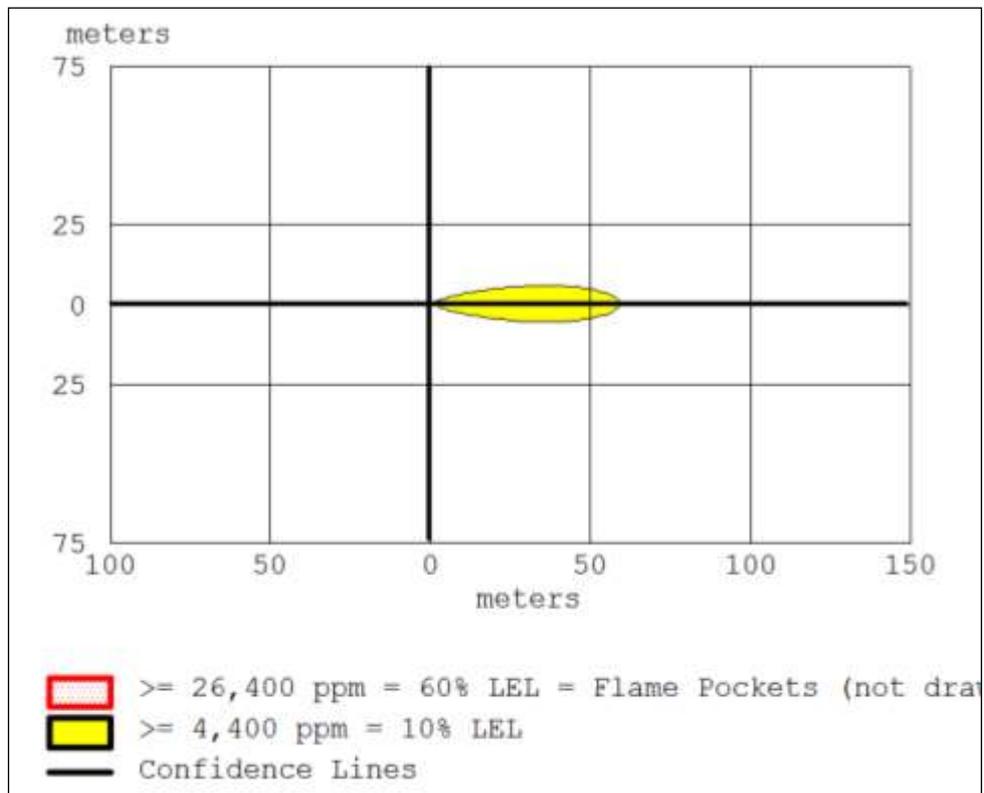
The flammable area is the part of a flammable vapor cloud where the concentration is in the flammable range, between the Lower and Upper Explosive Limits (LEL and UEL). These limits are percentages that represent the concentration of the fuel (that is, the chemical vapor) in the air. If the chemical vapor comes into contact with an ignition source (such as a spark), it will burn only if its fuel-air concentration is between the LEL and the UEL—because that portion of the cloud is already pre-mixed to the right mixture of fuel and air for burning to occur. If the fuel-air concentration is below the LEL, there is not enough fuel in the air to sustain a fire or an explosion—it is too lean. If the fuel-air concentration is above the UEL, there is not enough oxygen to sustain a fire or an explosion because there is too much fuel—it is too rich.

When a flammable vapor cloud is dispersing, the concentration of fuel in the air is not uniform; there will be areas where the concentration is higher than the average and areas where the concentration is lower than the average. This is called concentration patchiness. Because of concentration patchiness, there will be areas (called pockets) where the chemical is in the flammable range even though the average concentration has fallen below the LEL. Because of this, ALOHA's default flammable LOCs are each a fraction of the LEL, rather than the LEL itself. ALOHA uses 60% of the LEL as the default LOC for the red threat zone, because some experiments have shown that flame pockets can occur in places where the average concentration is above that level. Another common threat level used by responders is 10% of the LEL, which is ALOHA's default LOC for the yellow threat zone. The flammable LOC threat zones for methane release are as follows:

Red : 26,400 ppm = 60% LEL = Flame Pockets  
 Yellow: 4,400 ppm = 10% LEL

Well site risk contour maps for worst case scenario prepared based on ALOHA modeling of natural gas releases for flammable vapour cloud has been presented in **Figures 1.2-1.4** below.

**Figure 1.3 Scenario I: Risk Contour Map**



**THREAT ZONE:**

Threat Modelled: Flammable Area of Vapor Cloud

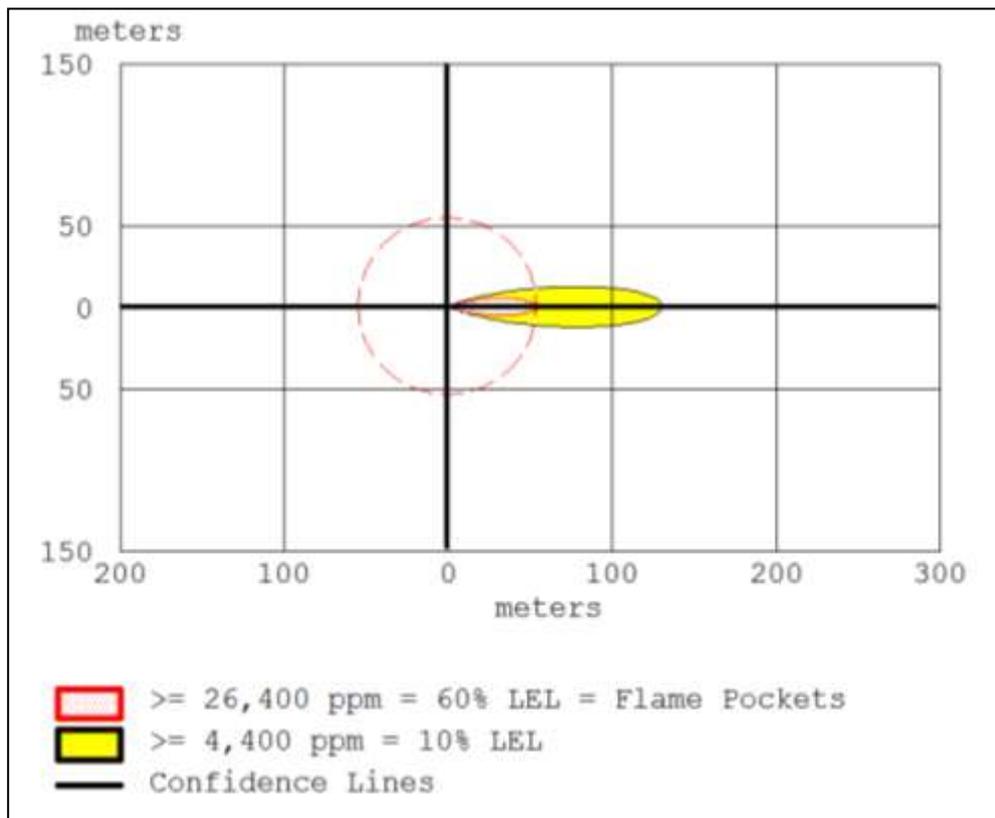
Model Run: Gaussian

Red : 25 meters --- (26,400 ppm = 60% LEL = Flame Pockets)

Note: Threat zone was not drawn because effects of near-field patchiness make dispersion predictions less reliable for short distances.

Yellow: 60 meters --- (4,400 ppm = 10% LEL)

**Figure 1.4 Scenario II: Risk Contour Map**



**THREAT ZONE:**

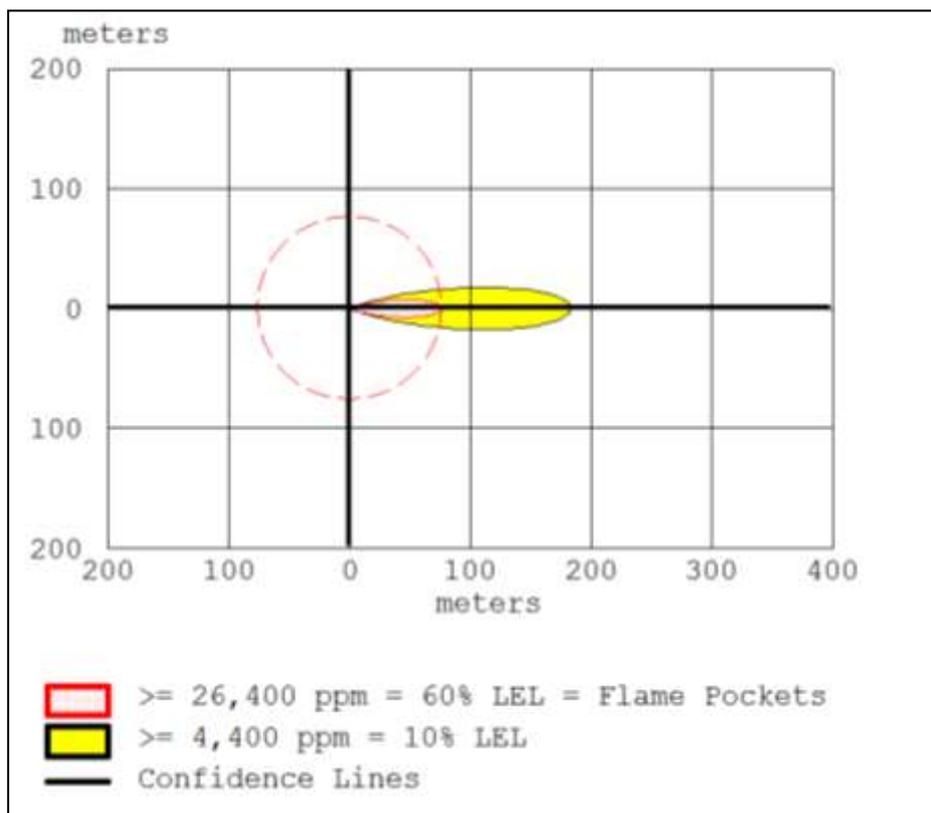
Threat Modeled: Flammable Area of Vapor Cloud

*Model Run: Gaussian*

*Red : 55 meters --- (26,400 ppm = 60% LEL = Flame Pockets)*

*Yellow: 131 meters --- (4,400 ppm = 10% LEL)*

**Figure 1.5 Scenario III: Risk Contour Map**



**THREAT ZONE:**

Threat Modelled: Flammable Area of Vapor Cloud

Model Run: Gaussian

Red : 77 meters --- (26,400 ppm = 60% LEL = Flame Pockets)

Yellow: 183 meters --- (4,400 ppm = 10% LEL)

The zone of flammable vapour cloud calculated for hypothetical natural gas release under risk scenarios discussed in the earlier sections have been presented in the **Table 1.12** below.

**Table 1.12 Zone of Flammable Vapour Cloud-Natural Gas Release Scenarion**

Release Type	Release Rate (kg/s)	Red -60% LEL (m)	Yellow -10% LEL (m)
Small	1	25	65
Medium	5	55	131
Large	10	77	183

Hence for a worst case scenario (10kg/s) the flammable vapor cloud zone/flame pockets' resulting from accidental release of natural gas will be covering a radial zone of 77m from source with the flammable gas concentration within this zone being 26,400 ppm.

Based on the flammable vapour cloud concentration modelled for the worst case scenario (10 kg/s) an effort was made to establish the overpressure (blast force zone) that may result from delayed

ignition of vapour cloud generated from any such accidental release. For overpressure risk modelling using ALOHA a delayed ignition time of 5 minutes was considered of the vapour cloud mass. However the threat modelled revealed that Level of Concern (LOC) was never exceeded that may possibly lead to damage to property or life within the blast radius. The results have been provided in **Figure 1.6** below.

**Figure 1.6 Scenario III (Worst Case) – Overpressure Risk Modelling**

```

Threat Modeled: Overpressure (blast force) from vapor cloud explosion
Time of Ignition: 5 minutes after release begins
Type of Ignition: ignited by spark or flame
Level of Congestion: uncongested
Model Run: Gaussian
Explosive mass at time of ignition: 188 kilograms
Red : LOC was never exceeded --- (8.0 psi = destruction of buildings)
Orange: LOC was never exceeded --- (3.5 psi = serious injury likely)
Yellow: LOC was never exceeded --- (1.0 psi = shatters glass)
    
```

The risk significance for the potential blow out scenario resulting from development drilling has been presented below. For calculating the risk significance, the likelihood ranking is considered to be “2” as the frequency analysis for blow outs incidents is computed at “~ 10<sup>-5</sup>” whereas the consequence ranking has been identified to be as “4” given the worst case scenario modelling (blast overpressure) indicates that the LOC was never exceeded leading to multiple fatalities (For criteria ranking please refer to Table 7.1 & 7.2).

*Risk Ranking – Blowout Natural Gas Release (Worst Case Scenario)*

Likelihood ranking	2	Consequence ranking	4
Risk Ranking & Significance = 8 i.e. “Low” i.e. Risk is Acceptable and can be managed through use of existing controls and evaluation of additional controls.			

### 1.4.2 Hydrocarbons Leaks Due to Loss of Containment While Drilling & Testing

The releases of hydrocarbons that may be isolated from reservoir fluids include gas releases in the mud return area during drilling. The consequences of gas releases are described in this section. ALOHA model has been used to model the releases from failure of the test separator.

#### 1.4.2.1 Frequency Analysis

Review of the hydrocarbon release database (HCRD) of 2003 for **One North Sea Platform** indicates the process gas leak frequencies for large releases (>10 kg/s) to be about **6.0 x 10<sup>-3</sup> per year**. The same frequency has been considered for potential release from leaks due to loss of containment while drilling.

#### Gas Releases during Drilling

##### a) Flash Fire

If gas is entrained in the mud then it could be released from the mud pits or shakers. The amount of gas returned is unlikely to be so great that a jet fire could occur, but the gas could build up into a flammable vapour cloud in the mud pit area. If the cloud then ignites it will result in a flash fire or vapour cloud explosion. Again, there is also the potential for a toxic cloud to be present if the release is during a period when sour crude is a possibility. The mud return typically contains around 50%

water this means it cannot be ignited in liquid form so there is no danger of pool fires. Liquid mud fires are therefore not considered further.

The mud - gas separator can be other source that contains both flammable liquid and gas.

A well test separator rupture could result in release of gas when a gas cloud will form, initially located around the release point. If the release is ignited immediately then a fireball will be formed. If this cloud is not immediately ignited, then a vapour cloud will form, which will disperse with the wind and diluted as a result of air entrainment. The principal hazard arising from a cloud of dispersing flammable material is its subsequent (delayed) ignition, resulting in a flash fire. Large-scale experiments on the dispersion and ignition of flammable gas clouds show that ignition is unlikely when the average concentration is below the lower flammability limit (LFL).

As in the case for blow outs,) an effort was made to establish the overpressure (blast force zone) that may result from delayed ignition of vapour cloud generated from any such accidental release. For overpressure risk modelling using ALOHA a delayed ignition time of 5 minutes was considered of the vapour cloud mass. However the threat modelled revealed that Level of Concern (LOC) was never exceeded that may possibly lead to damage to property or life within the blast radius. The results have been provided in **Figure 1.7** below.

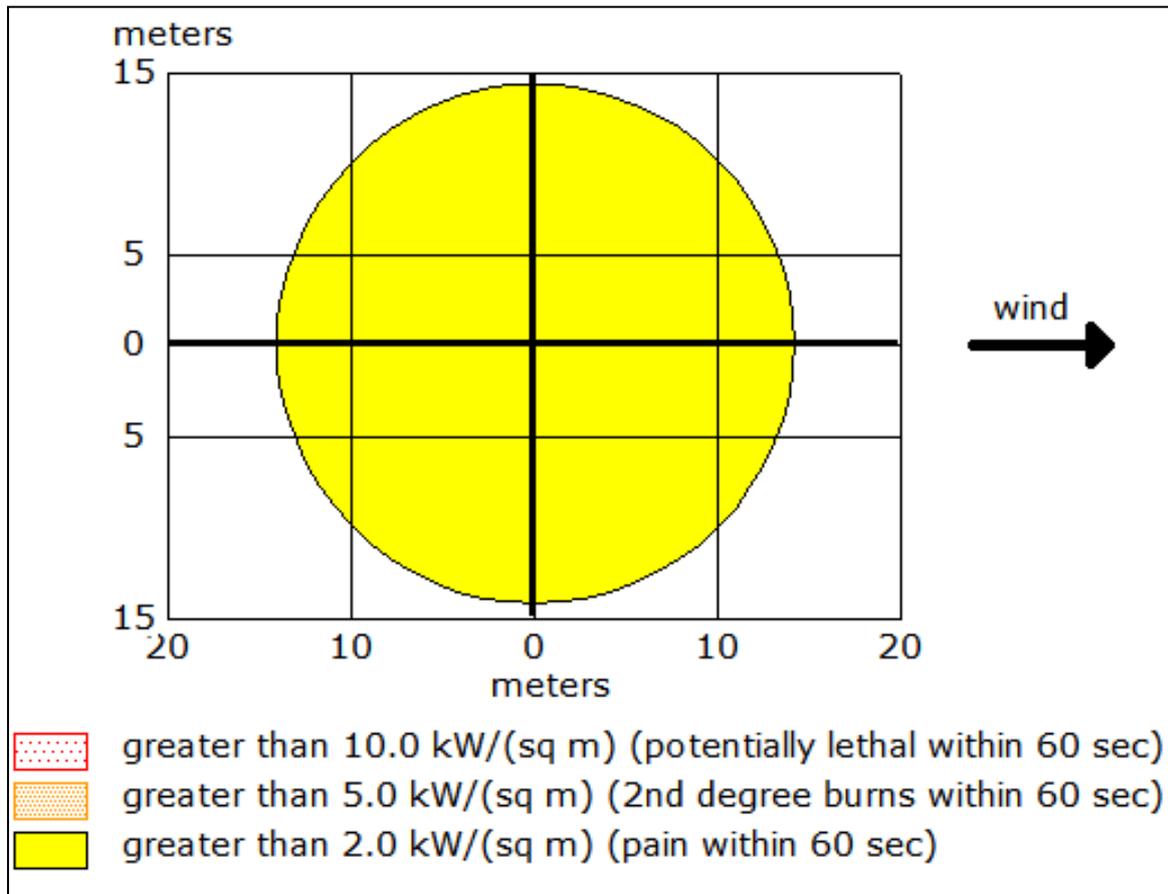
### **Figure 1.7 Overpressure Risk Modeling – Well Releases during drilling**

Threat Modeled: Overpressure (blast force) from vapor cloud explosion  
Type of Ignition: ignited by spark or flame  
Level of Congestion: uncongested  
Model Run: Gaussian  
Red : LOC was never exceeded --- (8.0 psi = destruction of buildings)  
Orange: LOC was never exceeded --- (3.5 psi = serious injury likely)  
Yellow: LOC was never exceeded --- (1.0 psi = shatters glass)

#### **b) Jet Fire**

The term jet fire is used to describe the flame produced due to the ignition of a continuous pressurised leakage from the pipe work. Combustion in a jet fire occurs in the form of a strong turbulent diffusion flame that is strongly influenced by the initial momentum of the release. Flame temperatures for typical jet flames vary from 1600°C for laminar diffusion flames to 2000°C for turbulent diffusion flames. The principal hazards from a jet fire are thermal radiation and the potential for significant knock-on effects, such as equipment failure due to impingement of the jet fire. The thermal radiations distances due to Jet Flame are shown in *Figure 1.8* and *Figure 7.8* below.

**Figure 1.8 Thermal Radiation Distances of Jet Flame due to Leak of 25 mm size**



**THREAT ZONE:**

Threat Modeled: Thermal radiation from jet fire

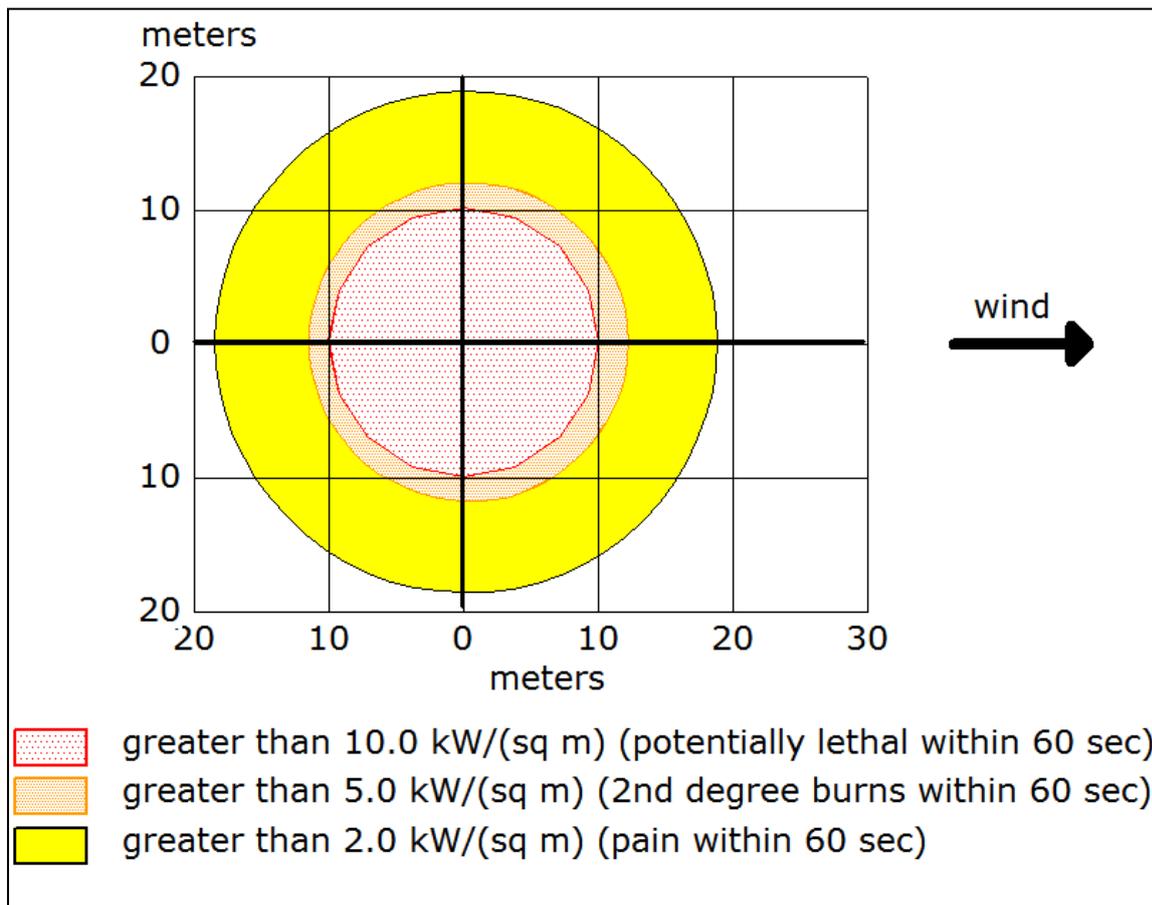
Model Run: Gaussian

Red: < 10 meters --- (10.0 kW/(sq m) = potentially lethal within 60 sec)

Orange: < 10 meters --- (5.0 kW/(sq m) = 2nd degree burns within 60 sec)

Yellow: 14 meters --- (2.0 kW/(sq m) = pain within 60 sec)

**Figure 1.9 Thermal Radiation Distances of Jet Flame due to Leak of 50 mm size**



**THREAT ZONE:**

Threat Modeled: Thermal radiation from jet fire

Model Run: Gaussian

Red : 10 meters --- (10.0 kW/(sq m) = potentially lethal within 60 sec)

Orange: 12 meters --- (5.0 kW/(sq m) = 2nd degree burns within 60 sec)

Yellow: 19 meters --- (2.0 kW/(sq m) = pain within 60 sec)

The zone of thermal radiation calculated for hypothetical release and ignition of natural gas during well testing have been presented in the **Table 1.13** below.

**Table 1.13 Thermal Radiation Zone -Natural Gas Release Scenario during Well Testing**

Release Type	Red (kW/sqm)	Orange (kW/sqm)	Yellow (kW/sqm)
Leak of 25 mm size	<10	<10	14
Leak of 50 mm size	10	12	19

Hence for a worst case scenario (50 mm leak) the ignition of natural gas release will be resulting in generation of thermal radiation which will be lethal within a maximum radius of 10m within 1 minute of its occurrence.

The risk significance for the potential well release scenario resulting from development drilling has been presented below. For calculating the risk significance, the likelihood ranking is considered to be “2” as the frequency analysis for blow outs incidents is computed at “~ 10<sup>-5</sup>” whereas the consequence ranking has been identified to be as “4” given the worst case scenario modelling (blast overpressure)/jet fire indicates that the LOC was never exceeded leading to multiple fatalities (For criteria ranking please refer to Table 7.1 & 7.2).

*Risk Ranking – Jet Fire/Blast Overpressure from Well Releases (Worst Case Scenario)*

Likelihood ranking	2	Consequence ranking	4
<b>Risk Ranking &amp; Significance = 8 i.e. “Low” i.e. Risk is Acceptable and can be managed through use of existing controls and evaluation of additional controls.</b>			

### 1.4.3 Sub-Sea Hydrocarbon Pipeline

As discussed in the project description section, the following hydrocarbon pipelines is likely to be laid as part of the proposed project viz.

- 8” X 11.5km buried crude oil sub-sea pipeline from MOPU to the existing 30” ICP-Heera Pipeline; and
- 6” X 1.35km spurline to tie-in point from MOPU to the existing 14” WO-16 BPB pipeline.

Some of the key hazard likely to be associated with same has been presented below

- Jet fires associated with pipework failures; and
- Pool fires.

#### 1.4.3.1 Pipeline Failure Frequency Analysis – Gas Pipelines

An effort has also been made to understand the primary failure frequencies of pressurised gas/oil to be transported through the interconnecting pipeline network. Based on the European Gas Pipeline Incident Data Group (EGIG) database the evolution of the primary failure frequencies over the entire period and for the last five years has been provided in **Table 1.14** below.

**Table 1.14 Primary Gas Pipeline Failure Frequency**

Period	No. of Incidents	Total System Exposure (km.yr)	Primary failure frequency (1000 km.yr)
1970-2007	1173	3.15.10 <sup>6</sup>	0.372
1970-2010	1249	3.55.10 <sup>6</sup>	0.351
1970-2013	1309	3.98.10 <sup>6</sup>	0.329
1974-2013	1179	3.84.10 <sup>6</sup>	0.307
1984-2013	805	3.24.10 <sup>6</sup>	0.249
1994-2013	426	2.40.10 <sup>6</sup>	0.177
2004-2013	209	1.33.10 <sup>6</sup>	0.157
2009-2013	110	0.70.10 <sup>6</sup>	0.158

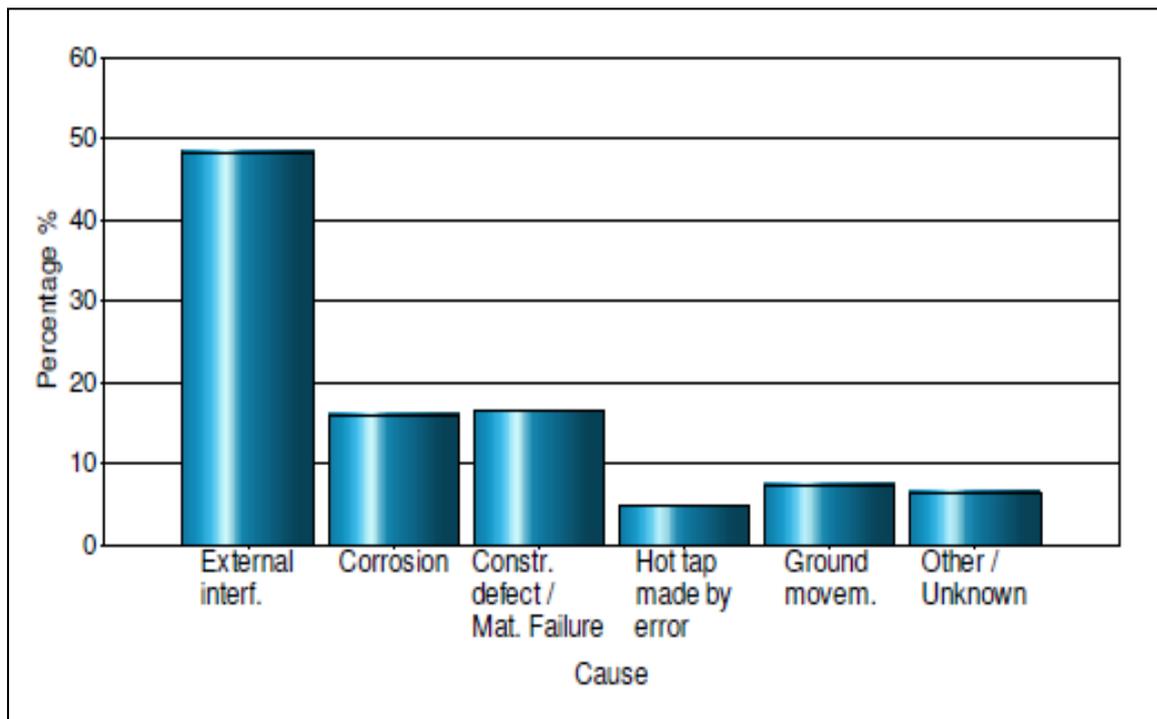
Source: 9th EGIG Report

As referred in the above table the overall failure frequency (0.33) of the entire period (1970-2013) is slightly lower than the failure frequency of 0.35 reported in the 8<sup>th</sup> EGIG report (1970-2010). The failure frequency of the last 5 years was found to be 0.16 per 1000km.year, depicting an improved performance over the recent years.

### Incident Causes

Gas pipeline failure incidents can be attributed to the following major causes viz. external interference, construction defects, corrosion (internal & external), ground movement and hot tap. The distribution of incidents with cause has been presented in the **Figure 1.10** below.

**Figure 1.10 Gas Pipeline Failure – Distribution of Incident & Causes**



Source: 8<sup>th</sup> EGIG Report

The interpretation of the aforesaid figure indicated external interference as the major cause of pipeline failure contributing to about 48.4% of the total failure incidents followed by construction defects (16.7%) and corrosion related problems (16.1%). Ground movement resulting from seismic disturbance, landslides, flood etc. contributed to only 7.4% of pipeline failure incident causes.

Review of the 9<sup>th</sup> EGIG report indicates that primary failure frequency varies with pipeline diameter, and the same has been presented in **Table 1. 15** below.

**Table 1. 15 Primary Failure Frequency based on Diameter Class (1970-2013)**

Nominal Diameter (inch)	Primary failure frequency (per km.yr)		
	Pinhole/Crack	Hole	Rupture
diameter < 5"	4.45 X 10 <sup>-4</sup>	2.68 X 10 <sup>-4</sup>	1.33 X 10 <sup>-4</sup>
5" ≤ diameter < 11"	2.80 X 10 <sup>-4</sup>	1.97 X 10 <sup>-4</sup>	6.40 X 10 <sup>-5</sup>
11" ≤ diameter < 17"	1.27 X 10 <sup>-4</sup>	0.98 X 10 <sup>-4</sup>	4.10 X 10 <sup>-5</sup>
17" ≤ diameter < 23"	1.02 X 10 <sup>-4</sup>	5.00 X 10 <sup>-5</sup>	3.40 X 10 <sup>-5</sup>
23" ≤ diameter < 29"	8.50 X 10 <sup>-5</sup>	2.70 X 10 <sup>-5</sup>	1.20 X 10 <sup>-5</sup>
29" ≤ diameter < 35"	2.30 X 10 <sup>-5</sup>	5.00 X 10 <sup>-6</sup>	1.40 X 10 <sup>-5</sup>
35" ≤ diameter < 41"	2.30 X 10 <sup>-5</sup>	8.00 X 10 <sup>-6</sup>	3.00 X 10 <sup>-6</sup>
41" ≤ diameter < 47"	7.00 X 10 <sup>-6</sup>	-	-
diameter ≥ 47"	6.00 X 10 <sup>-6</sup>	6.00 X 10 <sup>-6</sup>	6.00 X 10 <sup>-6</sup>

Source: 9th EGIG Report

The pipeline failure frequency viz. leaks or rupture for the natural gas pipeline has been computed based on the aforesaid table. Considering the natural gas spurline to be laid is likely to have a diameter of 6 inches, the probability of pinhole is estimated to be **2.80 x 10<sup>-4</sup> per km year**, while full bore rupture is considered to be **6.40 x 10<sup>-5</sup> per km year**. (Refer **Table 1. 16** below).

**Table 1. 16 Interconnecting Gas Pipeline - Failure Frequency**

Sl. No	Pipeline Failure Case	EGIG Failure Frequency (per km.year)	Pipeline Dia (inch)	Avg. Pipeline Length (km)	Project Pipeline Failure Frequency (per year)	Frequency
1	Pipeline Rupture	6.40 X 10 <sup>-5</sup>	6	1.35	8.64 x 10 <sup>-5</sup>	Not Likely
2	Pipeline Leak	2.80 X 10 <sup>-4</sup>	6	1.35	3.78 x 10 <sup>-4</sup>	Not Likely

Thus the probability of pipeline leak and rupture with respect to the interconnecting hydrocarbon pipeline network is identified to be both "*Not Likely*".

#### 1.4.3.2 Oil Pipeline Failure Frequency

Concawe (2015) has developed estimates for leak frequencies from onshore crude oil pipelines. Over the past 20 years the typical leak frequency from larger oil pipelines (>16") has been of the order 0.2 per 1000 km pipeline and year, among these 19% are defined as rupture, giving the largest spill rate, often of the order the transport rate of the pipeline after an initially higher transient leak rate. 17% of the holes were defined as "split", with an opening of 75-1000mm x 10% of diameter, which could also give release rates similar to the pipeline flow rate. This would correspond to a total release frequency of 2x10<sup>-4</sup>/y and rupture plus split frequency of 7x10<sup>-5</sup>/y per km pipeline. Almost half of the releases were categorized as caused by 3rd party, a small, but a strongly increasing fraction last couple of years was found to be intentional, primarily due to theft.

Review of the CONCAWE<sup>6</sup> accident database for the period 1970-2010, reveals the liquid pipeline failure frequency in Europe to be around 1.01 X10<sup>-6</sup>; hence for the 8" inch crude oil pipelines (~11.5km

<sup>6</sup> Davis, P. M., Dubois, J., Gambardella, F., Sanchez-Garcia, E., Uhlig F., (2011). "Performance of European cross-country oil pipelines - Statistical summary of reported pillages in 2010 and since 1971". Report no. 8/11, CONCAWE,

length) from MOPU to the tie in point the frequency is computed to be around  $1.16 \times 10^{-5}$  i.e. “*Not Likely*”.

### 1.4.3.3 Gas Pipeline Failure – Ignition Probability

The ignition probability of natural gas pipeline failure (rupture & leaks) with respect to the proposed expansion project is derived based on the following equations as provided in the Igem/TD/2 standard

$$\left. \begin{aligned} P_{\text{ign}} &= 0.0555 + 0.0137pd^2; \text{ for } 0 \leq pd^2 \leq 57 \\ \text{(For pipeline ruptures)} \\ P_{\text{ign}} &= 0.81; \text{ for } pd^2 > 57 \end{aligned} \right\}$$

$$\left. \begin{aligned} P_{\text{ign}} &= 0.0555 + 0.0137(0.5pd^2); \text{ for } 0 \leq 0.5pd^2 \leq 57 \\ \text{(For pipeline leaks)} \\ P_{\text{ign}} &= 0.81; \text{ for } 0.5pd^2 > 57 \end{aligned} \right\}$$

Where:

$P_{\text{ign}}$  = Probability of ignition  
 $p$  = Pipeline operating pressure (bar)  
 $d$  = Pipeline diameter (m)

The ignition and jet fire probability of natural gas release from a leak/rupture of interconnected pipeline network is calculated based on the above equations and presented in **Table 7.17** below.

**Table 1. 17 Interconnecting Pipeline – Ignition & Jet Fire Probability**

Sl. No	Pipeline Failure Case	Pipeline Dia (inch)	Project Pipeline Failure Frequency (per year)	Ignition Probability	Jet Fire Probability
1	Pipeline Rupture	6	$8.64 \times 10^{-5}$	0.102	$8.81 \times 10^{-5}$
2	Pipeline Leak	6	$3.78 \times 10^{-4}$	0.078	$2.98 \times 10^{-5}$

Hence from the above table it can be concluded that ignition probability of natural gas that may be released from the interconnecting pipeline due to any accidental event is considered to be “**Not likely**”.

### 1.4.3.4 Oil Pipeline Failure – Ignition Probability

OGP (2010) gives an estimated ignition probability for large crude oil releases of 0.70% in rural areas; hence considering the same the ignition probability of oil spills/leakages from 8” crude oil pipeline (~11.5km length) is computed to be around  **$1.05 \times 10^{-5}$** .

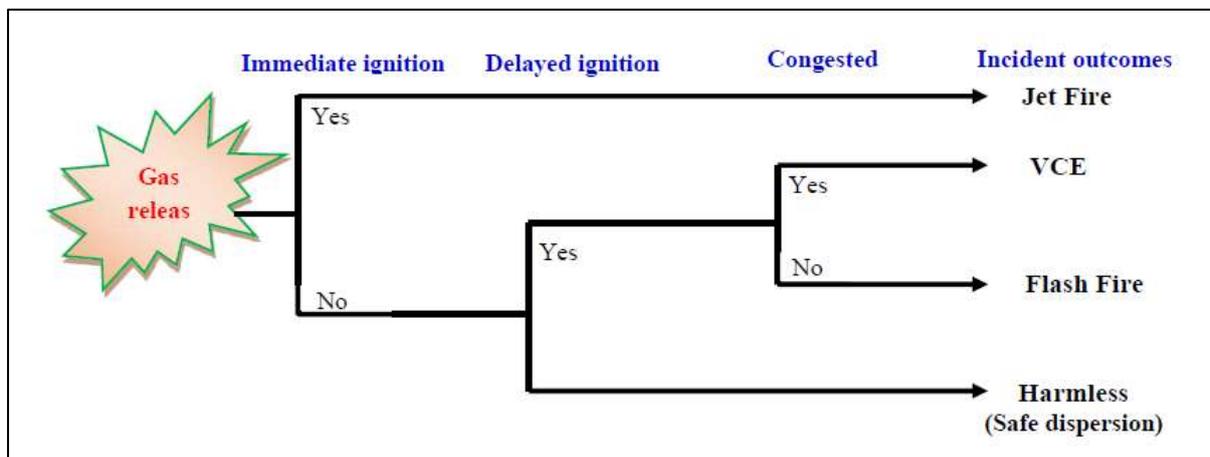
### 1.4.3.5 Consequence Analysis – Sub-Sea Pipelines

Pipelines generally contains large inventories of oil or gas under high pressure; although accidental releases from them are remote they have the potential of catastrophic or major consequences if related risks are not adequately analysed or controlled. The consequences of possible pipeline failure is generally predicted based on the hypothetical failure scenario considered and defining parameters such as meteorological conditions (stability class), leak hole & rupture size and orientation, pipeline pressure & temperature, physicochemical properties of chemicals released etc.

In case of pipe rupture containing highly flammable natural gas, an immediate ignition will cause a jet fire. Flash fires can result from the release of natural gas through the formation of a vapour cloud with delayed ignition and a fire burning through the cloud. A fire can then flash back to the source of the leak and result in a jet fire. Flash fires have the potential for offsite impact as the vapour clouds can

travel considerable distances downwind of the source. Explosions can occur when a flammable gas cloud in a confined area is ignited; however where vapour cloud concentration of released material is lower than Lower Flammability Limit (LFL), consequently the occurrence of a VCE is highly unlikely. VCE, if occurs may result in overpressure effects that become more significant as the degree of confinement increases (Refer **Figure 1.11**). Therefore, in the present study, only the risks of jet fires for the below scenarios have been modelled and calculated.

**Figure 1.11 Natural Gas Release – Potential Consequences**



[Source: “Safety risk modelling and major accidents analysis of hydrogen and natural gas releases: A comprehensive risk analysis framework” - Iraj Mohammadfam, Esmaeil Zarei]

Based on the above discussion and frequency analysis as discussed in the earlier section, the following hypothetical risk scenarios (Refer **Table 1.18**) have been considered for consequence analysis of the sub-sea crude oil and gas evacuation pipelines.

**Table 1.18 Interconnecting Pipeline Risk Modelling Scenarios**

Scenario	Source	Pipeline dia (inch)	Accident Scenario	Design Pressure (bar)	Temperature	Potential Risk
1	Pipeline	6	Leak of 25mm dia	148	91°C	Jet Fire
2	Pipeline	6	Leak of 50mm dia	148	91°C	Jet Fire
3	Pipeline	6	Complete rupture	148	91°C	Jet Fire
4	Pipeline	8	Leak of 25mm dia	144	65°C	Pool Fire
5	Pipeline	8	Leak of 50mm dia	144	65°C	Pool Fire
6	Pipeline	8	Complete rupture	144	65°C	Pool Fire

The pipeline failure risk scenarios have been modeled using ALOHA and interpreted in terms of Thermal Radiation Level of Concern (LOC) encompassing the following threshold values (measured in kilowatts per square meter) for natural gas (comprising of ~95% methane<sup>7</sup>) and crude oil (represented by n-decane) to create the default threat zones:

Red: 10 kW/ (sq. m) -- potentially lethal within 60 sec;

<sup>7</sup> [https://www.naesb.org/pdf2/wgg\\_bps100605w2.pdf](https://www.naesb.org/pdf2/wgg_bps100605w2.pdf)

<http://www.google.co.in/url?sa=t&rct=j&q=&esrc=s&source=web&cd=18&ved=0ahUKEwjF7MiDttPRAhVCMi8KHd7aD6cQFghrMBE&url=http%3A%2F%2Fwww.springer.com%2Fcontent%2Fdocument%2Fdocument%2Fdownload%2F9781848828711-c1.pdf%3FSGWID%3D0-0-45-862344-p173918930&usq=AFQjCNEaJkfyKI3fRUdi6xiRYeW-FJb2A>

Orange: 5 kW/ (sq. m) -- second-degree burns within 60 sec; and

Yellow: 2 kW/ (sq. m) -- pain within 60 sec.

For vapour cloud explosion, the following threshold level of concern has been interpreted in terms of blast overpressure as specified below:

Red: 8.0 psi – destruction of buildings;

Orange: 3.5 psi – serious injury likely; and

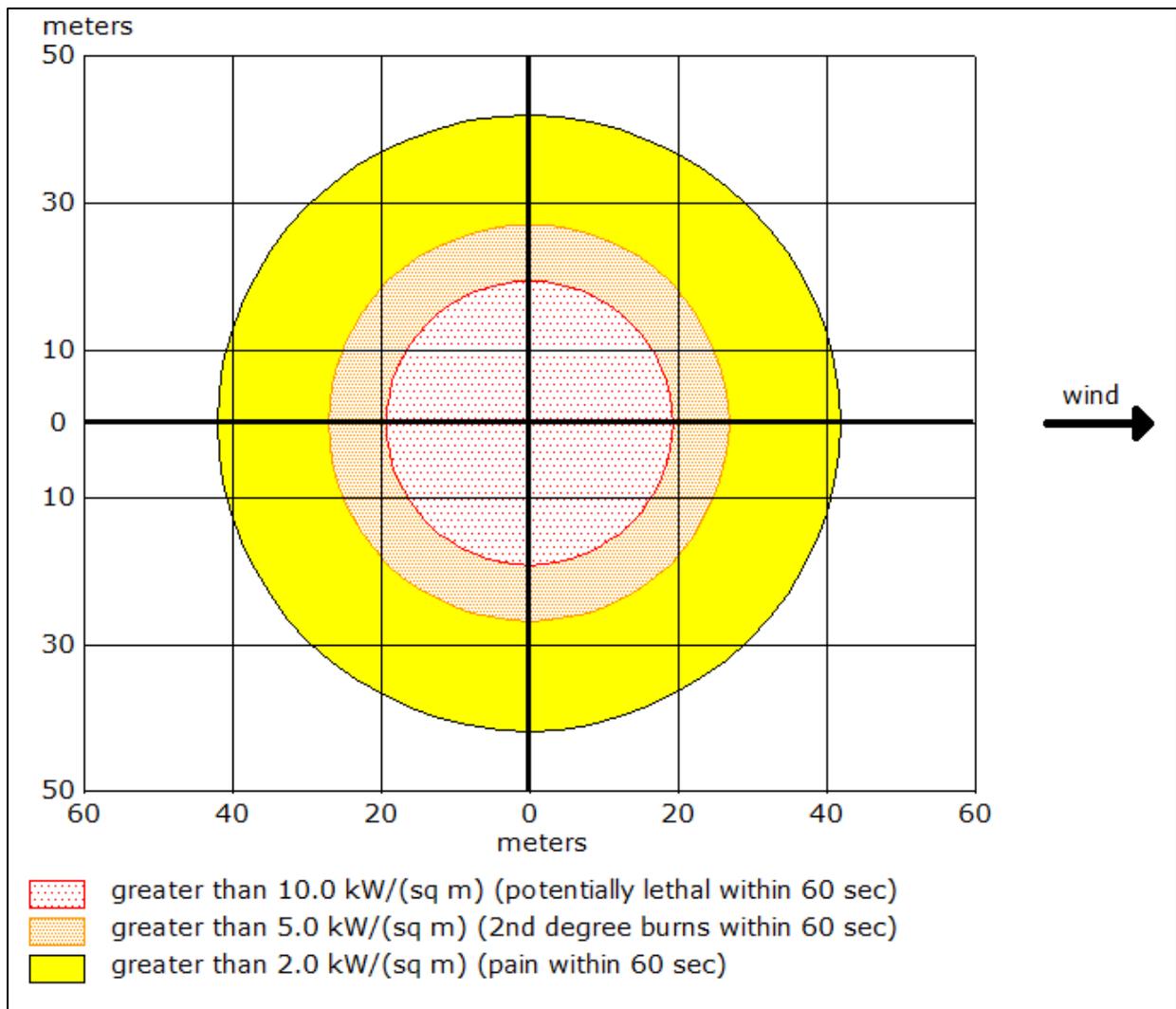
Yellow: 1.0 psi – shatters glass

The risk scenarios modelled for pipeline failure has been presented below:

**Scenario 1: Gas Pipeline Leak (25mm dia)**

The jet fire threat zone plot for release and ignition of natural gas from pipeline leak (25mm) is represented in **Figure 1.12** below.

**Figure 1.12 Threat Zone Plot – Gas Pipeline Leak (25mm dia)**



Source: ALOHA

**THREAT ZONE:**

Threat Modeled: Thermal radiation from jet fire

Red : 19 meters --- (10.0 kW/ (sq. m) = potentially lethal within 60 sec)

Orange: 27 meters --- (5.0 kW/ (sq. m) = 2nd degree burns within 60 sec)

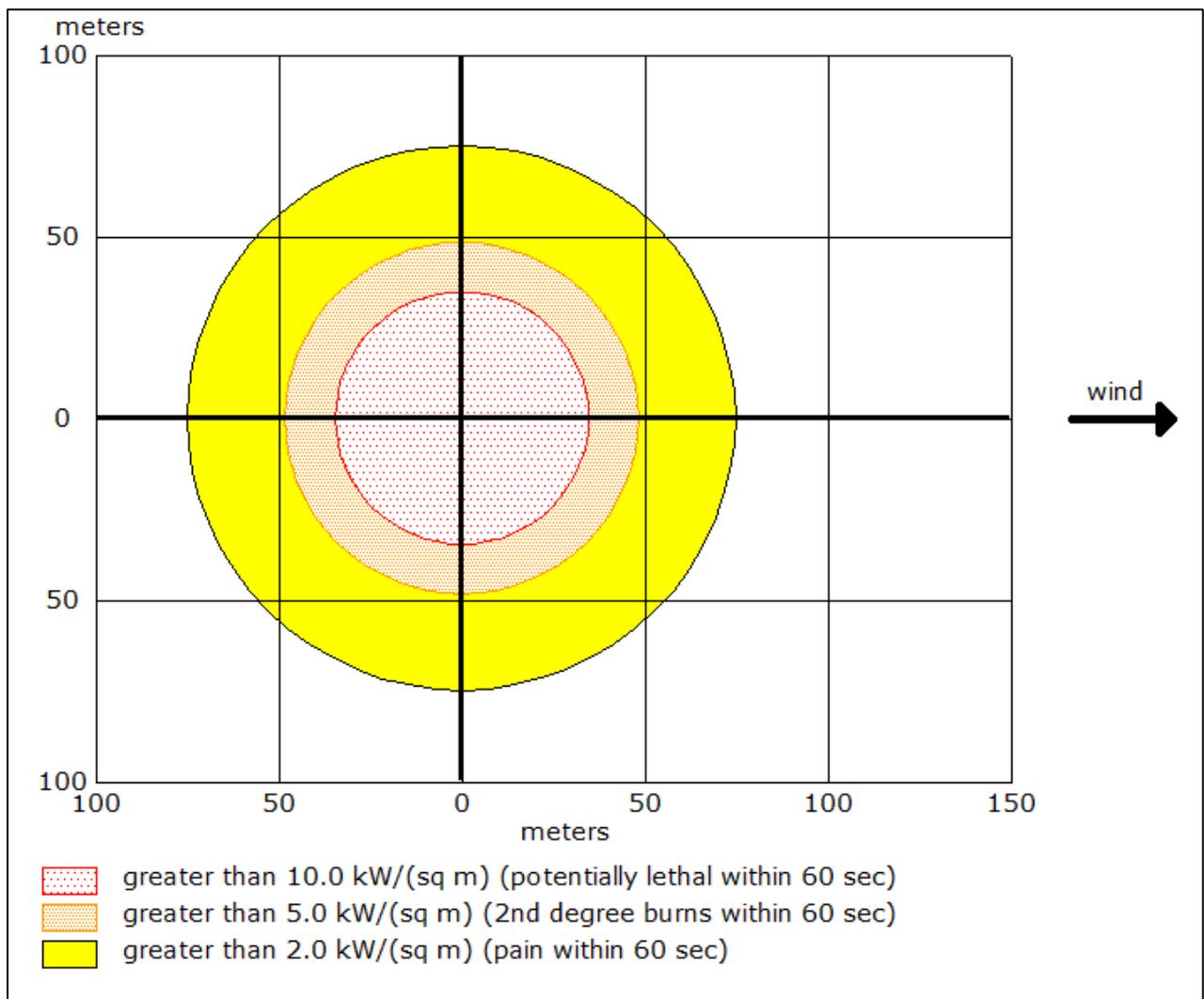
Yellow: 42 meters --- (2.0 kW/ (sq. m) = pain within 60 sec)

**The worst hazard for release and ignition of natural gas from the gas pipeline leak (25mm dia) will be experienced to a maximum radial distance of 19m from the source with potential lethal effects within 1 minute.**

*Scenario 2: Gas Pipeline Leak (50mm dia)*

The jet fire threat zone plot for release and ignition of natural gas from pipeline leak (50mm) is represented in **Figure 1.13** below.

**Figure 1.13 Threat Zone Plot – Gas Pipeline Leak (50mm dia)**



Source: ALOHA

**THREAT ZONE:**

Threat Modeled: Thermal radiation from jet fire

Red : 35 meters --- (10.0 kW/ (sq. m) = potentially lethal within 60 sec)

Orange: 48 meters --- (5.0 kW/ (sq. m) = 2nd degree burns within 60 sec)

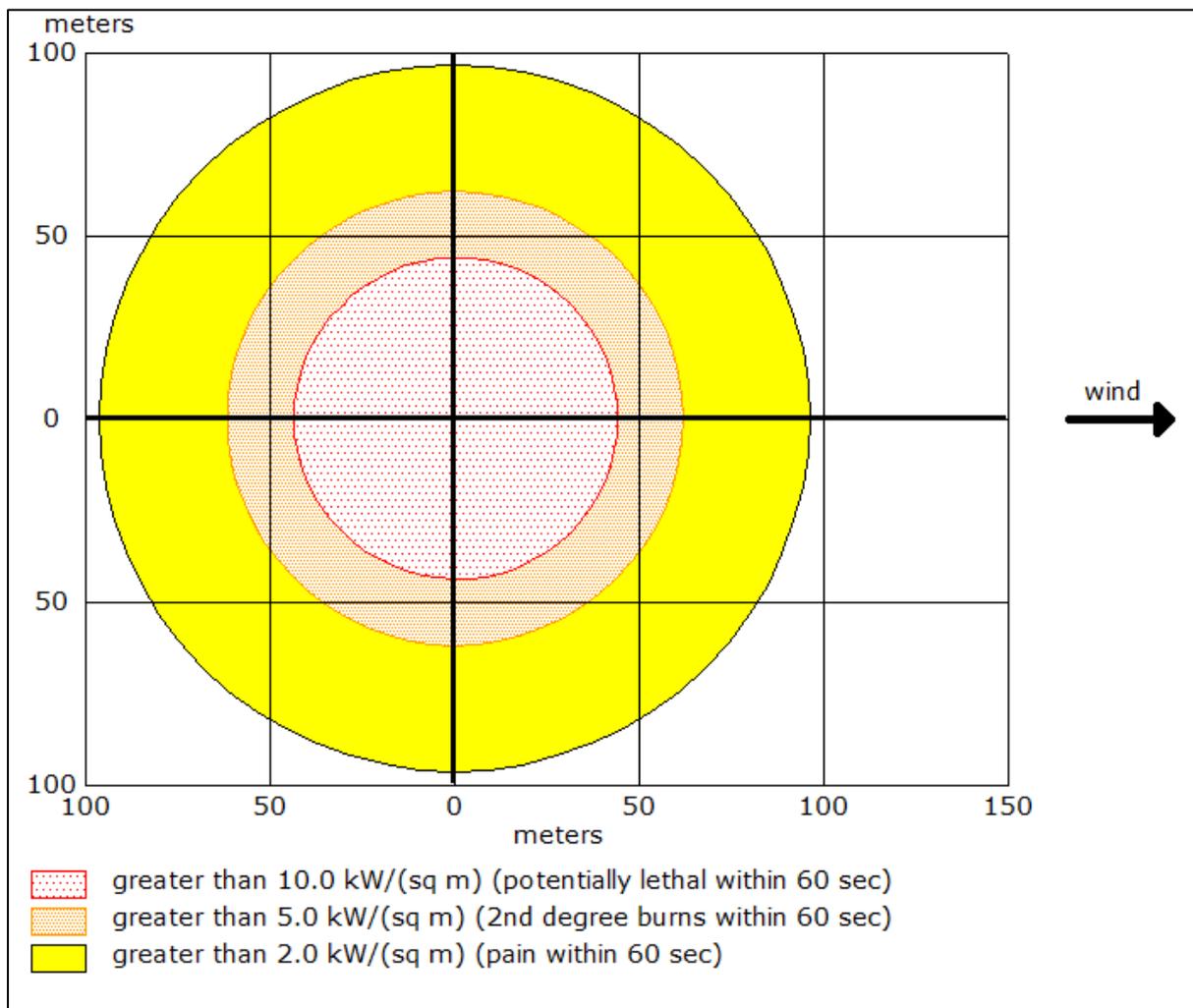
Yellow: 75 meters --- (2.0 kW/ (sq. m) = pain within 60 sec)

**The worst hazard for release and ignition of natural gas from the gas pipeline leak (50mm dia) will be experienced to a maximum radial distance of 35m from the source with potential lethal effects within 1 minute.**

*Scenario 3: Gas Pipeline Rupture*

The jet fire threat zone plot for release and ignition of natural gas from gas pipeline rupture is represented in **Figure 1.14** below.

**Figure 1.14 Threat Zone Plot – Gas Pipeline rupture**



Source: ALOHA

**THREAT ZONE:**

Threat Modeled: Thermal radiation from jet fire

Red : 45 meters --- (10.0 kW/ (sq. m) = potentially lethal within 60 sec)

Orange: 62 meters --- (5.0 kW/ (sq. m) = 2nd degree burns within 60 sec)

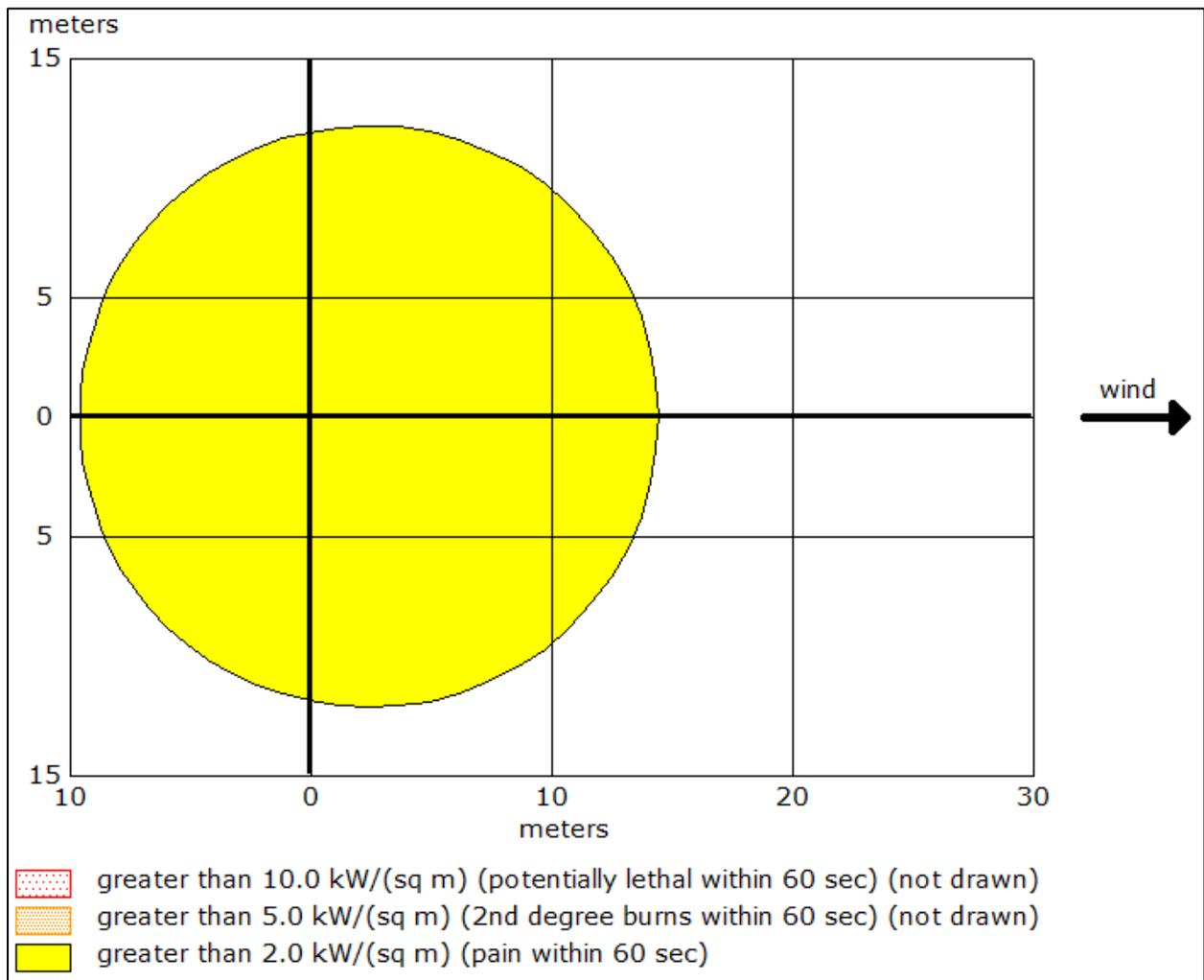
Yellow: 97 meters --- (2.0 kW/ (sq. m) = pain within 60 sec)

**The worst hazard for release and ignition of natural gas from pipeline rupture will be experienced to a maximum radial distance of 45m from the source with potential lethal effects within 1 minute.**

*Scenario 4: Crude Oil Pipeline Leak (25mm dia)*

The pool fire threat zone plot for release and ignition of crude oil from pipeline leak (25mm dia) is represented in **Figure 1.15** below.

**Figure 1.15 Threat Zone Plot –Crude Oil Pipeline Leak (25mm dia)**



Source: ALOHA

### THREAT ZONE:

Threat Modeled: Thermal radiation from pool fire

Red : <10 meters --- (10.0 kW/ (sq. m) = potentially lethal within 60 sec)

Orange: <10 meters --- (5.0 kW/ (sq. m) = 2nd degree burns within 60 sec)

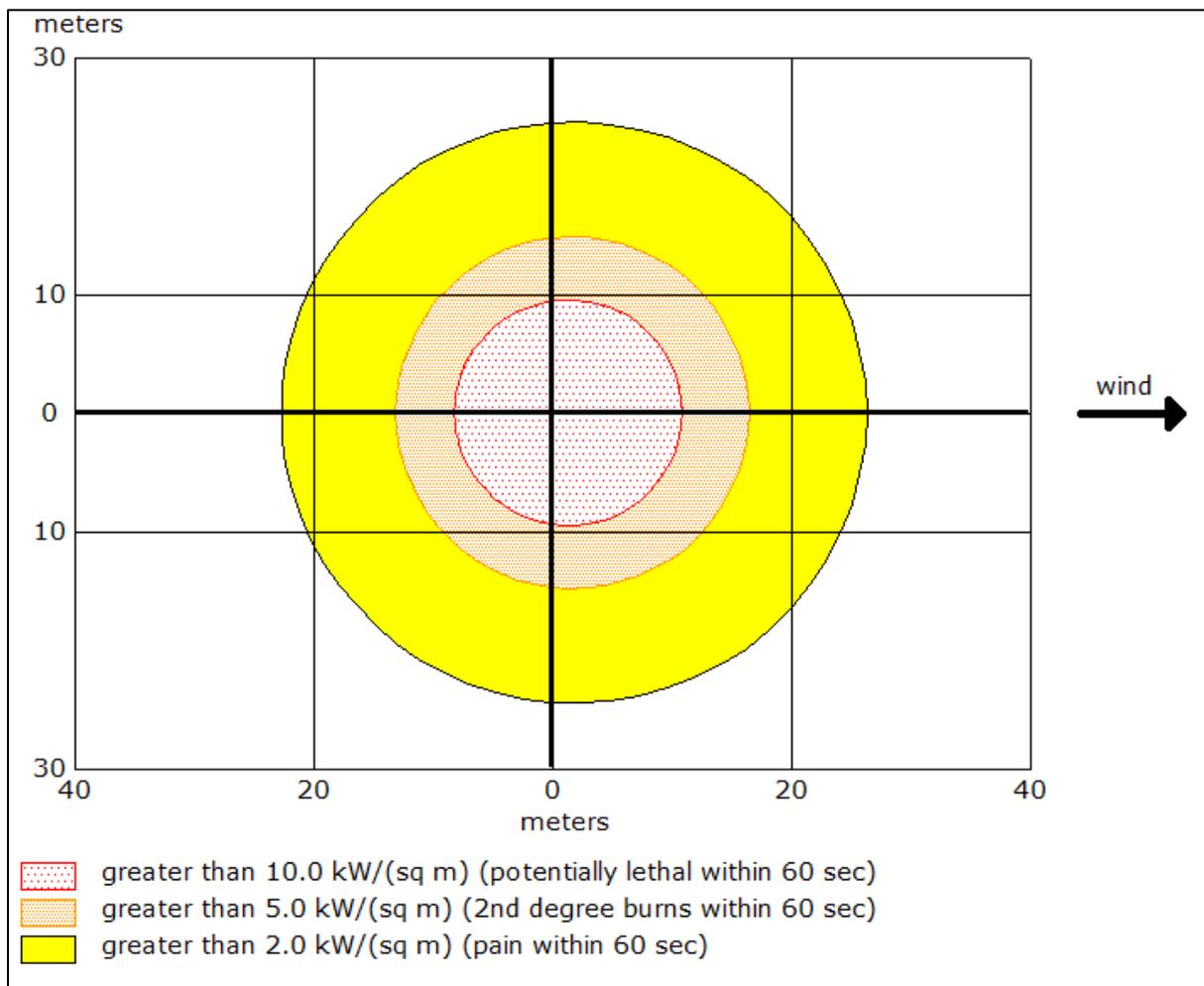
Yellow: 14 meters --- (2.0 kW/ (sq. m) = pain within 60 sec)

**The worst hazard for release and ignition of crude oil from pipeline leak (25mm dia) will be experienced to a maximum radial distance of <10m from the source with potential lethal effects within 1 minute.**

#### *Scenario 5: Crude Oil Pipeline Leak (50mm dia)*

The pool fire threat zone plot for release and ignition of crude oil from pipeline leak (50mm dia) is represented in **Figure 1.2** below.

**Figure 1.2 Threat Zone Plot – Crude Oil Pipeline Leak (50mm dia)**



Source: ALOHA

### THREAT ZONE:

Threat Modeled: Thermal radiation from pool fire

Red : 11 meters --- (10.0 kW/ (sq. m) = potentially lethal within 60 sec)

Orange: 17 meters --- (5.0 kW/ (sq. m) = 2nd degree burns within 60 sec)

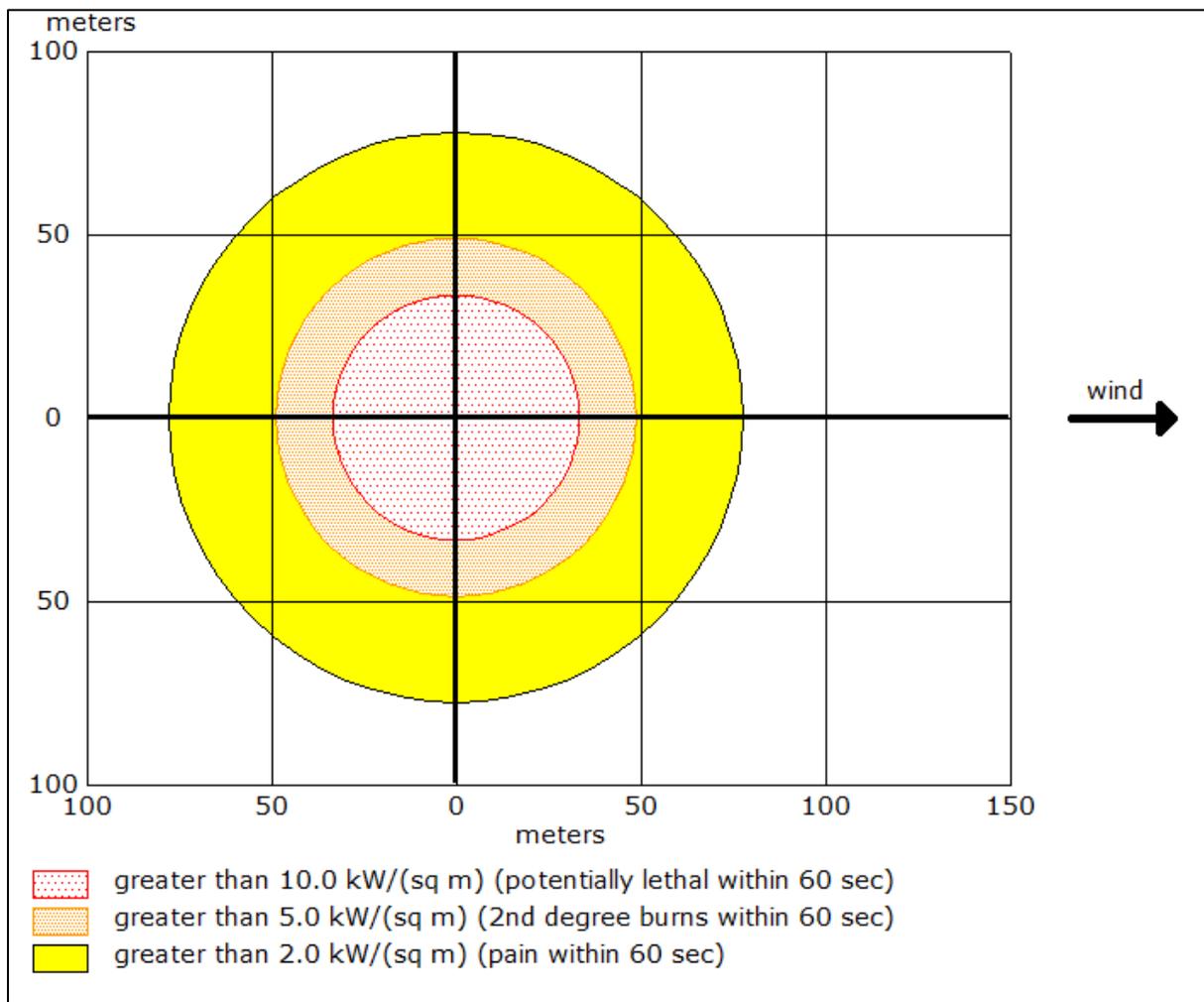
Yellow: 26 meters --- (2.0 kW/ (sq. m) = pain within 60 sec)

**The worst hazard for release and ignition of crude oil from pipeline leak (50mm dia) will be experienced to a maximum radial distance of 11m from the source with potential lethal effects within 1 minute.**

### Scenario 6: Crude Oil Pipeline Rupture

The pool fire threat zone plot for release and ignition of crude oil from pipeline rupture is represented in **Figure 1.17** below.

**Figure 1.17 Threat Zone Plot –Crude Oil Pipeline Rupture**



Source: ALOHA

**THREAT ZONE:**

Threat Modeled: Thermal radiation from pool fire

Red : 33 meters --- (10.0 kW/ (sq. m) = potentially lethal within 60 sec)

Orange: 49 meters --- (5.0 kW/ (sq. m) = 2nd degree burns within 60 sec)

Yellow: 78 meters --- (2.0 kW/ (sq. m) = pain within 60 sec)

**The worst hazard for release and ignition of crude oil from pipeline rupture will be experienced to a maximum radial distance of 33m from the source with potential lethal effects within 1 minute.**

For VCE modelled for catastrophic failure of interconnecting pipeline the LOC level was never exceeded

**THREAT ZONE:**

Threat Modeled: Overpressure (blast force) from vapor cloud explosion

Type of Ignition: ignited by spark or flame

Level of Congestion: uncongested

Model Run: Heavy Gas

Red : LOC was never exceeded --- (8.0 psi = destruction of buildings)

Orange: LOC was never exceeded --- (3.5 psi = serious injury likely)

Yellow: LOC was never exceeded --- (1.0 psi = shatters glass)

For calculating the risk significance of oil and gas pipeline, the likelihood ranking is considered to be “2” as the probability of pipeline rupture is computed to be  $\sim 10^{-5}$  per year; whereas the consequence ranking has been identified to be as “3” as given for a worst case scenario (rupture) lethal effects is likely to be limited within a radial zone of  $\sim 33$ m. Further as discussed in the earlier section, adequate number of leak and fire detection system of appropriate design will be provided for the subsea pipeline network to prevent for any major risk at an early stage of the incident.

*Risk Ranking – Pipeline Rupture (Worst Case Scenario)*

Likelihood ranking	2	Consequence ranking	3
Risk Ranking & Significance = 6 i.e. “Low” i.e. Risk is Acceptable and can be managed through use of existing controls and evaluation of additional controls.			

**1.4.4 Oil Spills**

**1.4.4.1 Frequency Analysis – Oil Spills**

Based on limitations regarding availability of oil spill incident data for India, the frequency analysis of oil spills with respect to the proposed project is based on the following report - “Water Transport Accident Statistics” as prepared by the International Association of Oil & Gas Producers. This datasheet provides information on water transport accident statistics which comprises of global data plus more detailed regional/national data where relevant or where available.

The report identifies vessel collision, contact, fire/explosion, structural failure, transfer spill, unauthorized discharge and grounding as the possible causes of oil spills. The spill frequency with respect to each of the aforesaid causes has been presented in the **Table 1.19** below.

**Table 1.19 Oil Spill Frequencies**

Accident Type	Oil Spill Frequency (spills per ship per year)	Oil Spill Rate (tonnes per ship per year)	Average Oil Spill Size (tonnes)
Collision	1.5 X 10 <sup>-3</sup>	4.49	2922
Contact	7.2 X 10 <sup>-4</sup>	0.11	148
Fire/Explosion	5.1 X 10 <sup>-4</sup>	1.52	2973
Structural Failure	1.3 X 10 <sup>-3</sup>	5.68	4435
Transfer spill	1.7 X 10 <sup>-3</sup>	0.23	133
Unauthorized storage	5.1 X 10 <sup>-4</sup>	0.21	408
Grounding	5.6 X 10 <sup>-4</sup>	5.20	9227
<b>TOTAL</b>	<b>6.9 X 10<sup>-3</sup></b>	<b>17.43</b>	<b>2522</b>

Source: Water Transport Accident Statistics – OGP

Similar observations were made with respect to the analysis of the *International Tanker Owners Pollution Federation Limited (ITOPF) Oil Tanker Spill Statistics 2015* which reveals that small (<7 tons) and medium (7-700 tons) sized spills account for 95% of all the incidents recorded; with a large percentage of these spills, 40% and 29% respectively, occurred during loading and discharging operations which normally takes place in ports/jetties. Large spill account for the remaining 5% of all the incidents recorded, and occurrence of such incidents have significantly decreased over the last 46 years. In 50% of the cases the larger spills occurred when the vessels were underway in open water; allisions, collisions and grounding accounted for 59% of the causes for these spills.

An annual Scandpower report based on SINTEF data compares the risk of different offshore activities. The report reveals that, **among the various phases of offshore operations, exploration drilling entails the highest risk of blowout.** In case of deep water, high pressure/ high-temperature (HPHT) wells, the blowout frequency is 1.9×10<sup>-3</sup> per drilled well “for offshore operations of North Sea standard”. In case of deep water, but “normal” wells, the frequency is only 3.1×10<sup>-4</sup>, i.e. one order of magnitude smaller. The reason the blowout frequency of HPHT wells is significantly higher is not believed to be the high pressure itself, but rather the small margin between pore pressure and fracture pressure in such wells. **The probability of a blowout during other activities, like development drilling, completion or production is well below that of exploration drilling, typically in the order of 10<sup>-4</sup> or 10<sup>-6</sup> per operation or well year which has been considered as the most credible frequency for oil spills for the proposed offshore development project.**

Hence based on the discussion, the probability of oil spills from the aforesaid accidental events for the proposed LNG storage and regasification facility is identified to be as “*Not Likely to Occasional/Rare*” (Refer *Error! Reference source not found.*).

#### 1.4.4.2 Consequence Analysis – Oil Spill

##### Properties of Spilled Oil

The main properties which affect the fate of spilled oil at sea are:

- specific gravity
- distillation characteristics (its volatility)
- viscosity (its resistance to flow)

- pour point (the temperature below which it will not flow).

In addition, the wax and asphaltene content influence the likelihood that the oil will mix with water to form a water-in-oil emulsion. Oils which form stable water-in-oil emulsions persist longer on the water surface. For the purpose of the risk assessment, crude oil has been considered as project involved development drilling of crude oil and natural gas wells.

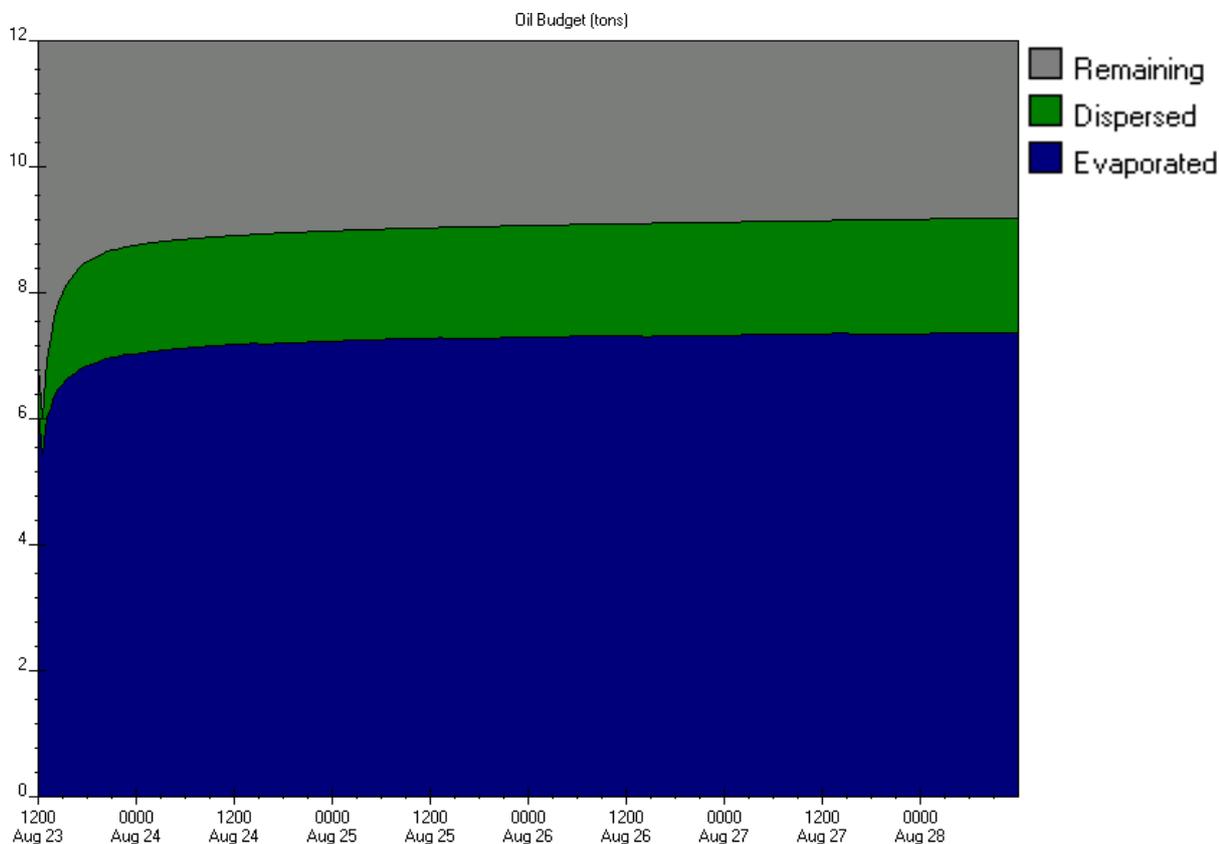
### Fate of Spilled Oil

When oil is spilled at sea it normally spreads out and moves on the sea surface with wind and current while undergoing a number of chemical and physical changes. These processes are collectively termed weathering and determine the fate of the oil. Some of these processes, like natural dispersion of the oil into the water, lead to the removal of the oil from the sea surface, and facilitate its natural breakdown in the marine environment. Others, particularly the formation of water-in-oil emulsions, cause the oil to become more persistent, and remain at sea or on the shoreline for prolonged periods of time.

The speed and relative importance of the processes depend on factors such as the quantity spilled, the oil's initial physical and chemical characteristics, weather and sea conditions and whether the oil remains at sea or is washed ashore. Ultimately, the marine environment usually eliminates spilled oil through the long-term process of biodegradation.

A run of ADIOS (Automated Data Inquiry for Oil Spills), model showed that 62% of Crude will evaporate and 15 % will be dispersed naturally within the first 6 hours under the prevailing sea and wind conditions. Around 23 % of spill will be left, either to be collected offshore or cleaned up ashore. Refer to **Figure 1.18** below.

Figure 1.18 Oil Spill Weathering – Model Output



Source: ADIOS

### 1.4.4.3 Oil Spill Scenarios

Stochastic and worst-case deterministic simulations were performed for each of the three potential spill scenarios using the Online Oil Spill Advisory System (OOSA) developed by the Indian National Centre of Ocean Information Services (INCOIS). All scenarios originated at 71° 45' 48.46" East, 19° 00' 9.57" North from a development well in the Arabian Sea. Medium Crude oil was spilled in all scenarios (Refer **Table 1.20**)

The two spill volumes simulated were:

- 150MT, representing the lower end of a significant accidental spill that may result from leakage of crude oil pipeline leaks;
- 300 MT, considered the largest instantaneous volume that would be spilled in the event of a blowout at MOPU or in case of vessel collision.

**Table 1.20 Oil Spill Release Scenarios**

Scenario	Oil Type	Season	Release Duration	Release Hours	Volume Released (MT)
1	Crude	Monsoon	Instantaneous	24 hours	150
2	Crude	Monsoon	Instantaneous	24 hours	300
3	Crude	Post Monsoon	Instantaneous	24 hours	150
4	Crude	Post Monsoon	Instantaneous	24 hours	300

As per the Indian Coast Guard Circular dated 1 May 2015, the OOSA has been developed for use by the Indian Coast Guard and other statutory authorities and combat agencies involved in spill cleanup and control measures in the event of a spill. On submission of necessary information like location of the spill, date, time, pollutant type and its quantity, the trajectory prediction set up is triggered in the background, along with forecasted forcing parameters such as wind and currents. OOSA immediately delivers the trajectory prediction of the spilled oil for the next forty eight to ninety hours, thereby enabling planning of clean-up activity. The system provided trajectory prediction for continuous and instantaneous spills. The circular requires registration of all concerned and their adequate familiarization with the OOSA software as an immediate next step in enhancing preparedness and ensuring proficient use of the software in the event of an oil spill contingency.

The spill modelled using OOSA for monsoon was extrapolated on an integrated web GIS maps and presented in **Figure 1.19** and **Figure 1.22** below.

Figure 1.19 Instantaneous Crude Oil Spill (150MT) – Monsoon



Source: OOSA

**Figure 1.20 Instantaneous Crude Oil Spill (300MT) – Monsoon**



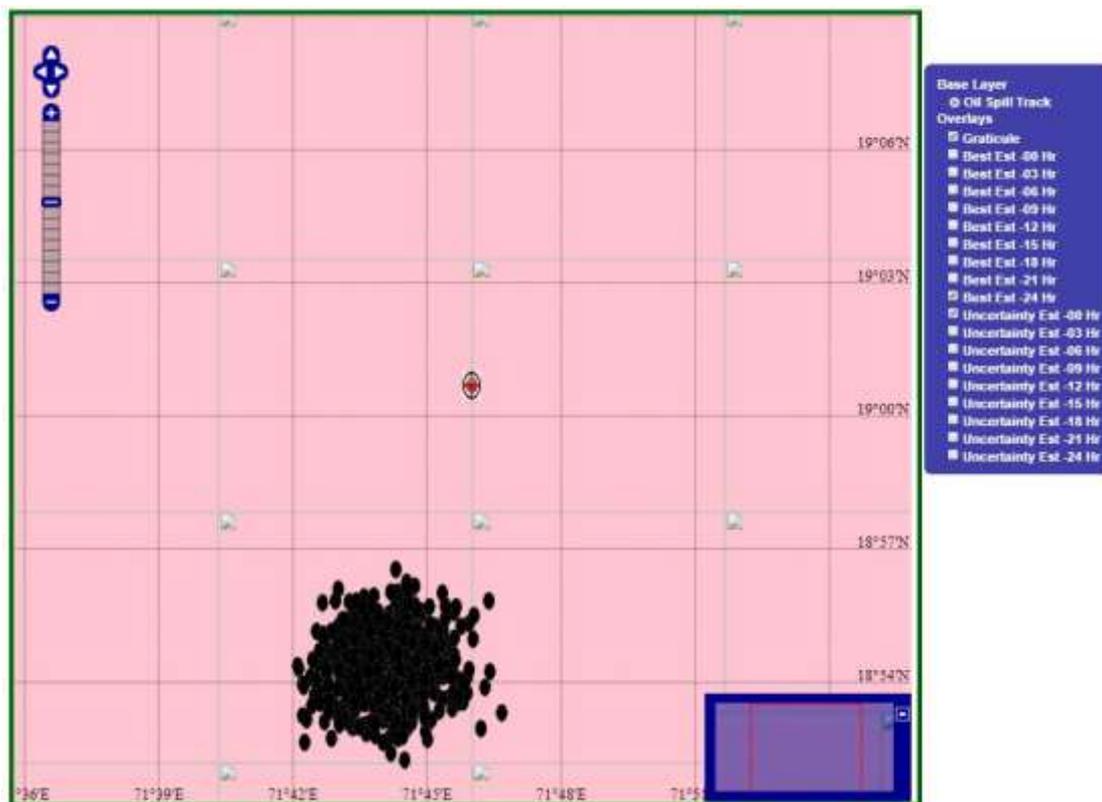
Source: OOSA

**Figure 1. 21 Instantaneous Crude Oil Spill (150MT) – Post Monsoon**



Source: OOSA

**Figure 1. 22 Instantaneous Crude Oil Spill (300MT) – Post Monsoon**



Source: OOSA

Interpretation of the model indicates, during the monsoon the both 150MT and 300 MT spill trajectory is observed towards east i.e. towards proposed project coastline; however shoreline impact has not been predicted by the model following 24 hours of instantaneous release. Similar observation has been made for the post monsoon spills, with the trajectory of such spills found to be towards North of the development wells with no shoreline impact predicted.

Further, HOEC as part of its Emergency Plan will adopt appropriate oil spill response measures in the form of use of spill control equipment and coordination with oil spill response groups/agencies viz. coast guard, port authorities to prevent the spread of the spill. Considering the above discussion, the impact is not likely to be significant.

*Risk Ranking – Oil Spill Release (Worst Case Scenario)*

<b>Likelihood ranking</b>	<b>2</b>	<b>Consequence ranking</b>	<b>3</b>
<b>Risk Ranking &amp; Significance = 6 i.e. “Low” i.e. Risk is Acceptable and can be managed through use of existing controls with the option for installation of additional controls, if necessary.</b>			

## 1.5 Disaster Management Plan

Disaster Management is a process or strategy that is implemented when any type of catastrophic event takes place. The Disaster Management Plan envisages the need for providing appropriate action so as to minimize loss of life/property and for restoration of normalcy within the minimum time in event of any emergency. Adequate manpower, training and infrastructure are required to achieve this. The objectives of Disaster Management Plan are as follows:

- Rapid control and containment of the hazardous situation;
- Minimising the risk and impact of occurrence and its catastrophic effects;
- Effective rehabilitation of affected persons and prevention of damage to Property and environment;
- To render assistance to outside the factory.

The following important elements in the disaster management plan (DMP) are suggested to effectively achieve the objectives of emergency planning:

- Reliable and early detection of an emergency and careful response;
- The command, co-ordination, and response organization structure along with efficient trained personnel;
- The availability of resources for handling emergencies;
- Appropriate emergency response actions;
- Effective notification and communication facilities;
- Regular review and updating of the DMP;
- Proper training of the concerned personnel.

### 1.5.1 Emergency Identified

Emergencies that may arise:

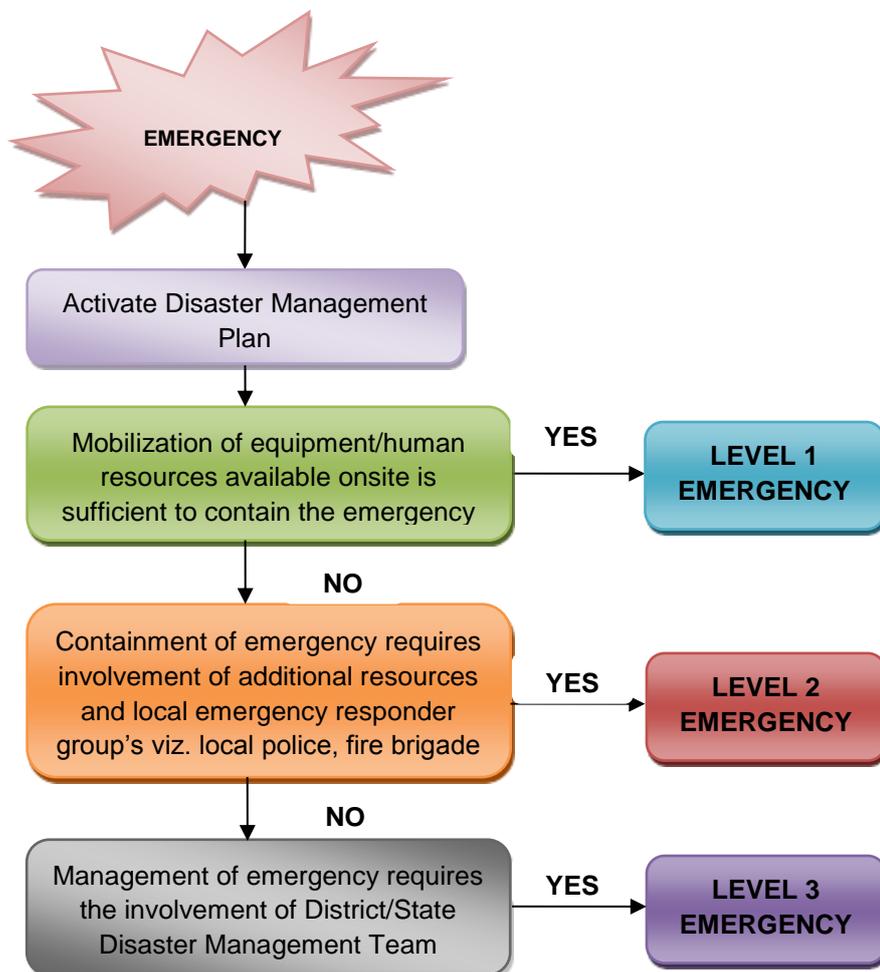
- Such an occurrence may result in on-site implications like :
  - Fire or explosion;
  - Leakage of natural gas; and
  - Oil spillage and subsequent fire.
- Incidents having off-site implications can be:
  - Natural calamities like earthquake, cyclone, lightening, etc.
- Other incidents, which can also result in a disaster, are :
  - Agitation / forced entry by external group of people;
  - Sabotage.

### 1.5.2 Emergency Classification

Due consideration is given to the severity of potential emergency situation that may arise as a result of accident events as discussed in the **Risk Analysis (RA)** study. Not all emergency situations call for mobilization of same resources or emergency actions and therefore, the emergencies are classified into three levels depending on their severity and potential impact, so that appropriate emergency response procedures can be effectively implemented by the Emergency Response Team. The emergency levels/tiers defined with respect to this project based on their severity have been

discussed in the subsequent sections with 'decision tree' for emergency classification being depicted in **Figure 1.22**

**Figure 1.22 Emergency Classification "Decision Tree"**



The emergency situations have been classified in three categories depending upon their magnitude and consequences. Different types of emergencies that may arise at the project site can be broadly classified as:

### 1.5.2.1 Level 1 Emergency

The emergency situation arising in any section of one particular plant / area which is minor in nature, can be controlled within the affected section itself, with the help of in-house resources available at any given point of time. The emergency control actions are limited to level 1 emergency organization only. But such emergency does not have the potential to cause serious injury or damage to property / environment and the domino effect to other section of the affected plant or nearby plants/ areas.

### 1.5.2.2 Level 2 Emergency

The emergency situation arising in one or more plants / areas which has the potential to cause serious injury or damage to property / environment within the affected plant or to the nearby plants / areas. This level of emergency situation will not affect surrounding community beyond the power plant facility. But such emergency situation always warrants mobilizing the necessary resources available in-house and/or outsources to mitigate the emergency. The situation requires declaration of On – Site emergency.

### 1.5.2.3 Level 3 Emergency

The emergency is perceived to be a kind of situation arising out of an incident having potential threat to human lives and property not only within the power plant facility but also in surrounding areas and environment. It may not be possible to control such situations with the resources available within HOEC. The situation may demand prompt response of multiple emergency response groups as have been recognized under the off-site district disaster management plan of the concerned district(s).

### 1.5.3 Preventive and Mitigation Measures for Blow Outs

Blowouts being events which may be catastrophic to any well operation, it is essential to take up as much a preventive measures as feasible. This includes:

- Necessary active barriers (eg. Well-designed Blowout Preventer) be installed to control or contain a potential blowout.
- Weekly blow out drills be carried out to test reliability of BOP and preparedness of drilling team.
- Close monitoring of drilling activity be done to check for signs of increasing pressure, like from shallow gas formations.
- Installation of hydrocarbon detectors.
- Periodic monitoring and preventive maintenance be undertaken for primary and secondary barriers installed for blow out prevention, including third party inspection & testing
- An appropriate Emergency Response Plan be finalized and implemented by HOEC.
- Marking of hazardous zone (500 meters) around the well site and monitoring of human movements in the zone.
- Training and capacity building exercises/programs be carried out for onsite drilling crew on potential risks associated with exploratory drilling and their possible mitigation measures.
- Installation of mass communication and public address equipment.
- Good layout of well site and escape routes.

Additionally, HOEC will be adopting and implementing the following Safe Operating Procedures (SOPs) developed as part of its Onsite Emergency Response Plan to prevent and address any blow out risks that may result during drilling and work over activities:

- Blow Out Control Equipment
- Choke lines and Choke Manifold Installation with Surface BOP
- Kill Lines and Kill Manifold Installation with Surface BOP
- Control System for Surface BOP stacks
- Testing of Blow Out Prevention Equipment
- BOP Drills

### 1.5.4 Preventive Measures for Handling of Natural Gas

- Leak detection sensors to be located at areas prone to fire risk/ leakages;
- All safety and firefighting requirements as per OISD norms to be put in place;
- High temperature and high pressure alarm with auto-activation of water sprinklers as well as safety relief valve to be provided;
- Flame proof electrical fittings to be provided for the installation;

- Periodical training/awareness to be given to work force at the project site to handle any emergency situation;
- Periodic mock drills to be conducted so as to check the alertness and efficiency and corresponding records to be maintained;
- Signboards including emergency phone numbers and 'no smoking' signs should be installed at all appropriate locations;
- Plant shall have adequate communication system;
- Pipeline route/equipment should be provided with smoke / fire detection and alarm system. Fire alarm and firefighting facility commensurate with the storage should be provided at the unloading point;
- 'No smoking zone' to be declared at all fire prone areas. Non sparking tools should be used for any maintenance; and
- Wind socks to be installed to check the wind direction at the time of accident and accordingly persons may be diverted towards opposite direction of wind.

### **1.5.5 Preventive Measures for Subsea Pipeline Risk Management**

- Design all pipes and vessels to cope with maximum expected pressure;
- Install pressure transmitters that remotely monitor high- and low-pressure alarms;
- Design equipment to withstand considerable heat load;
- Conduct regular patrols and inspections of pipeline easements;
- Fit pumps with automatic pump shutdown or other safety devices;
- Minimise enclosed spaces where flammable gas may accumulate;
- Where necessary, automate emergency shutdown systems at production facilities;
- Consider installing flow and pressure instrumentation to transmit upset conditions and plant shutdown valves status;
- Install fire and gas detection systems;
- Implement security controls;
- Install emergency shutdown buttons on each production facility;
- Bury gathering lines at a minimum depth of 600 mm and where above ground, maintain a clear area;
- Implement management of change processes; and
- Conduct pressure testing and inspection of equipment and pipelines.

### **1.5.6 Preventing Fire and Explosion Hazards**

- Proper marking to be made for identification of locations of flammable storages;
- Provision of secondary containment system for all fuel and lubricating oil storages;
- Provision of fire and smoke detectors at potential sources of fire and smoke;
- Storing flammables away from ignition sources and oxidizing materials;
- Providing specific worker training in handling of flammable materials, and in fire prevention or suppression;
- Equipping facilities with fire detectors, alarm systems, and fire-fighting equipment;

- Fire and emergency alarm systems that are both audible and visible;
- For safety of people the building, regulations concerning fire safety to be followed. Some of the requirements include:
- Installation of fire extinguishers all over the building;
- Provision of water hydrants in operative condition;
- Emergency exit;
- Proper labelling of exit and place of fire protective system installation;
- Conducting mock drills;
- Trained personnel to use fire control systems.

### **1.5.7 General Health and Safety**

- The facility will adopt a total safety control system, which aims to prevent the probable accidents such as fire accidents or chemical spills.
- Fire fighting system, such as sprinklers system, portable extinguishers (such as CO<sub>2</sub>) and automated fire extinguishers shall be provided at strategic locations with a clear labelling of the extinguisher so the type of the extinguisher is easily identifiable. Also a main hydrant around the buildings will be available. On all floors an automated fire detection system will be in place.
- The site operations manager will take steps to train all emergency team members and shall draw up an action plan and identify members. The appointed emergency controller shall act as the in-charge at the site of the incident to control the entire operation.
- The staff shall be trained for first-aid and firefighting procedures. The rescue team shall support the first-aid and firefighting team.
- A first-aid medical centre will be onsite to stabilise the accident victim. The emergency team will make contact with a nearby hospital for further care, if required.
- A training and rehearsal of the emergency response by emergency team members and personnel on site will be done regularly.
- A safe assembly area will be identified and evacuation of the premises will be practised regularly through mock drills.
- In case an emergency is being declared, the situation shall be reported to the authorities such as local police, the chief inspector of factories and the state pollution control board as per rules and regulation of law of the land.
- Safety manual for storage and handling of Hazardous chemicals shall be prepared.
- All the personnel at the site shall be made aware about the hazardous substance stored and risk associated with them.
- Personnel engaged in handling of hazardous chemicals shall be trained to respond in an unlikely event of emergencies.
- A written process safety information document shall be compiled for general use and summary of it shall be circulated to concerned personnel.
- MSDS shall be made available and displayed at prominent places in the facility. The document compilation shall include an assessment of the hazards presented including (i) toxicity information (ii) permissible exposure limits. (iii) Physical data (iv) thermal and chemical stability data (v) reactivity data (vi) corrosivity data (vii) safe procedures in process.
- Safe work practices shall be developed to provide for the control of hazards during operation and maintenance

- In the material storage area, hazardous materials shall be stored based on their compatibility characteristics.
- Near miss and accident reporting system shall be followed and corrective measures shall be taken to avoid / minimize near miss incidents.
- Safety measures in the form of DO and Don't Do shall be displayed at strategic locations.
- Safety audits shall be conducted regularly.
- Firefighting system shall be tested periodically for proper functioning.
- All hydrants, monitors and valves shall be visually inspected every month.
- Disaster Management Plan shall be prepared and available with concerned personnel department.

### **1.5.8 Personal Protective Equipment**

In certain circumstances, personal protection of the individual maybe required as a supplement to other preventive action. It should not be regarded as a substitute for other control measures and must only be used in conjunction with substitution and elimination measures. PPEs must be appropriately selected individually fitted and workers trained in their correct use and maintenance. PPEs must be regularly checked and maintained to ensure that the worker is being protected.

### **1.5.9 First Aid**

First aid procedures and facilities relevant to the needs of the particular workforce should be laid down and provided in consultation with an occupational physician or other health professional.

Health assessment should form a part of a comprehensive occupational health and safety strategy. Where employees have to undergo health assessment, there should be adequate consultation prior to the introduction of such program. Medical records should be kept confidential. Site should be able to relate employee health and illness data to exposure levels in the workplace.

### **1.5.10 Oil Spill Response Actions**

The action points to be followed in case of a spill are mentioned below;

#### **1.5.10.1 Action Points**

##### **Case 1: If the oil has not yet reached banks**

###### **Actions**

- Deploy sand bags and absorbent socks down gradient from the oil, or erect temporary barriers such as trenches or mounds to prevent the oil from flowing towards riverbanks

##### **Case 2: If the oil has reached the river banks**

###### **Actions**

- Trigger Tier I response;
- Deploy floating shoreline booms immediately downstream from the release point;
- Deploy protective booming measures for downstream receptors that may be impacted by the spill.

Details of shoreline response mechanism is mentioned below

## 1.5.10.2 SHORELINE OIL SPILL RESPONSE

### *Introduction*

The shoreline oil spill response will be undertaken as per industry best practices and as guided by Indian Coast Guard and KoPT. Standard practices are enumerated below.

### *Shoreline Response planning and strategy*

When the oil reaches the shoreline, the following information is to be obtained:-

- Type of shoreline impacted- in this case the shoreline is predominantly muddy
- Characteristics of oil/oily material-tar balls, viscous oil, liquid oil,
- oiled sand (if any);
- Extent of oiling-upper shore/lower shore, heavy, moderate, patchy, light staining;
- Sketch maps/profile of shore showing extent of oiling;
- Assess volumes of oily materials.

### *Containment Operation*

Containment operations are employed if the protection priorities demand that the sensitive shorelines such as mangroves, are protected from the oil spill as the ill effects of oil reaching such shoreline area can be irreversible in nature. Boom is deployed when an oil spill occurs on open water, in near-shore areas, while the boom surrounds and concentrates the spilled oil in a small area. This creates the optimum condition for the skimmer/pump for recovering the oil. Containment operations will be undertaken by with association with Indian Coast Guard. Specific response by ERT will however, depend on the guidance of Indian Coast Guard and port authorities.

### *Steps in Shoreline Clean-up Operations*

The three main steps in a shoreline clean-up operation that is to be followed for the proposed project are:

#### **Step 1: Assessment**

- Indian Coast Guard, port authorities and local experts' familiar with the ecology of the coastline will be consulted as to which areas should be treated. A "leave –alone" action could also be considered if the expert/Indian Coast Guard suggests as clean-up mechanism sometimes can lead to more ecosystem damage;
- If clean up mechanism is to be initiated in consultation with the ecological expert/ Indian Coast Guard/port authorities; the degree of clean up required will be assessed in consultation with the ecological expert; Indian Coast Guard and port authorities.

#### **Step 2: Clean-up Operations (Specific to muddy shores)**

- It possible, patches of oil will be removed by surface skimmers adjusted to these special circumstances;
- Under favourable circumstances the use of sorbents may be considered, especially if isolated concentrations of oil are accessible;
- Light mechanical equipment (non-sparking spades and shovels) for manual cleaning will be deployed in consultation with the Indian Coast Guard;
- Care should be taken not to use heavy machinery, or let people trample over the oiled area;
- Minimize collection of un-oiled debris, sediments & its separate storage.

### Step 3: Termination/Monitoring

- Ongoing assessment of clean-up operations will be conducted;
- Determine compliance to clean-up objectives
- Post-spill monitoring to confirm recovery of shoreline features.

### *Storage of Oil and Oily Waste*

The end result of shoreline clean-up activities is that significant quantities of waste material have to be temporarily stored and transported to be their final disposal sites. A critical factor to consider during disposal operations is to minimize the amount of wastes that must be processed. Also, wastes should be segregated as much as possible to maintain flexibility in the choice of disposal options.

Any form of oily waste generated from oil spills will be identified as hazardous with their storage and handling being governed by the relevant provision of the Hazardous Waste Rules, 2016.

With respect to the proposed project, the shoreline oily waste collected will be stored in dedicated drum/containers of specified capacity (~10,000 litres capacity). The storage area will be covered, lined and placed well above the high tide mark to prevent any contamination of surrounding area or ground wastes. Further there will be provision of secondary containment and spill kits at the waste storage area to control any accidental spills during storage and handling. The storage drums also will be labelled with type, nature and quantity of waste being stored.

### *Transport and Disposal of Oil and Oily waste*

HOEC will initiate discussion with the relevant waste disposal agencies who maintains an Integrated Hazardous Wastes Transfer Storage and Disposal Facility (TSDF) during the project construction stage. Necessary authorization for disposal of hazardous wastes will be obtained before commencement of operations. Secured trucks will be called in from the aforesaid facilities for transport and disposal of wastes generated from oil spills.





